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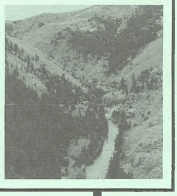
Final
Great Divide Resource Area Wilderness Environmental Impact Statement



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FINAL

WILDERNESS ENVIRONMENTAL IMPACT STATEMENT

for the

Great Divide Resource Area
(Formerly Medicine Bow Wilderness Supplement)

Prepared by:

U.S. Department of the Interior
Bureau of Land Management
Rawlins District Office
Rawlins, Wyoming

August 1990

Ray Brubaker
Wyoming State Director

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Bureau of Land Management

FINAL

Wilderness Environmental Impact Statement for the Great Divide Resource Area

( ) Draft (X) Final Environmental Impact Statement

Type of Action ( ) Administrative (X) Legislative

Responsible Agencies:

Lead Agency: Department of the Interior, Bureau of Land Management

Cooperating Agencies: None

ABSTRACT

The Great Divide Final Wilderness Environmental Impact Statement analyzes three wilderness study areas (WSAs) in the Rawlins District to determine the resource impacts that could result from designation or nondesignation of those WSAs as wilderness. The following WSAs are recommended as nonsuitable for wilderness designation: Encampment River, WY-030-301 (4,547 acres); and Bennett Mountains, WY-030-304 (6,003 acres). The Prospect Mountains WSA, WY-030-303 (1,145 acres), is recommended for wilderness designation.

Comments have been requested and received from the following:

See the "Consultation" section.

Date draft statement made available to the Environmental Protection Agency and the public.

Draft EIS: Filed February 1987

Final EIS:

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SUMMARY

INTRODUCTION

This Environmental Impact Statement (EIS) is an analysis of the effects of wilderness designation or nondesignation alternatives on 11,695 acres of public land in three wilderness study areas (WSAs). The study areas are all located in Carbon County. The Encampment River Canyon is in southern Carbon County, two miles south of Encampment; the Bennett Mountains WSA is in north central Carbon County east of Seminoe Dam; and the Prospect Mountain WSA is in southern Carbon County approximately 16 miles southeast of Encampment and 8 miles north of the Colorado-Wyoming border. This EIS was prepared in response to Section 202 and 603 of the Federal Land Policy and Management Act (FLPMA) which directs the Bureau of Land Management (BLM) to inventory, study, and report to Congress, through the Secretary of Interior and the President, those public lands suitable for preservation as wilderness.

MAJOR ISSUES AND CONCERNS

The wilderness review for the Medicine Bow Resource Area has involved many people. Based on contacts with industry, organizations, individuals, federal, state and local agencies, the following areas of concern and controversy were identified for the three WSAs.

1. Effects on wilderness values, including naturalness, solitude, primitive and unconfined recreation, and special features.
2. Effects on recreational opportunities, including the use of motorized vehicles, hunting, fishing, camping, and hiking.
3. Effects on oil and gas exploration and development.
4. Effects on locatable mineral exploration and development.
5. Effects on big game habitat.
6. Effects on livestock grazing and grazing management such as range developments and season of use.
7. Effects on timber harvesting.
8. Effects on topography.
9. Effects on climate.
10. Effects on wetland/riparian areas.
11. Effects on timber harvesting.
12. Effects on air quality.
13. Effects on special features.
14. Effects on cultural resources.
15. Effects on scenic values.
16. Effects on water quality.
17. Effects on adding acreage to the National Wilderness Preservation System (NWPS).
18. Effects on adding diversity to the NWPS.
19. Effects on the extension of existing wilderness areas (Platte River).
20. Effects on water development projects.
21. Effects on threatened and endangered species.

ALTERNATIVES INCLUDING THE PROPOSED ACTION

This EIS deals with three wilderness study areas. Two alternatives including the proposed action are examined for each WSA. The alternatives analyzed include All Wilderness and No Wilderness (No Action).

Encampment River Canyon WSA (WY-030-301)

Unit Description

The Encampment River Canyon WSA consists of 4,547 acres of public land. No private or state inholdings, and no split-estate lands are located within the WSA boundary. The topography of the entire unit is mountainous with steep canyons and rocky slopes. Elevations range from 7,200 feet to 8,545 feet. The dominant tree species within the unit are limber pine, lodgepole pine, cottonwood, and aspen. The Proposed Action has been changed from that in the draft EIS. All Wilderness is now the Proposed Action.

No Wilderness Alternative

Under this alternative, the Encampment River Canyon WSA would not be designated as wilderness. Resource management in the WSA would emphasize protection and enhancement of recreational, big game, and scenic values.

Proposed Action (All Wilderness)

Under this alternative, the Encampment River Canyon WSA would be designated as wilderness. The entire WSA would be closed to OHVs. Existing livestock management practices would be continued. Big game habitat enhancement would be undertaken.

Prospect Mountain WSA (WY-030-303)

Unit Description

The Prospect Mountain WSA consists of 1,145 acres of public land. No private or state inholdings, and no split-estate lands are located within the WSA boundary. The topography of the entire unit is mountainous with dense forest cover and riparian areas. Elevations range from 7,400 feet to 8,430 feet.

Proposed Action (All Wilderness)

Under this alternative, the Prospect Mountain WSA would be designated as wilderness. Activities such as road building, timber harvesting, the use of motorized equipment and vehicles would be prohibited.

No Wilderness Alternative

Under this alternative, the Prospect Mountain WSA would not be designated as wilderness. The WSA would be managed for dispersed recreation, big game habitat, and forest production.

Bennett Mountains WSA (WY-030-304)

Unit Description

The Bennett Mountains WSA consists of 6,003 acres of public land. No private or state inholdings, and no split-estate lands are located within the WSA boundary. There are three types of topography in the WSA: the mountain plateau/ridges; the steep rock ledges; and the many tributary draws. Elevations range from 6,600 feet to 8,000 feet.

Proposed Action (No Wilderness)

Under this alternative, the Bennett Mountains WSA would not be designated as wilderness. The WSA would be managed for dispersed recreation.

All Wilderness Alternative

Under this alternative, the Bennett Mountains WSA would be designated as wilderness. Management would provide for protection and preservation of the area's natural conditions and wilderness character.

ABBREVIATIONS

[Note: Many of these terms are further defined in the Glossary.]

ACEC	Area of critical environmental concern
BLM	Bureau of Land Management
CDNST	Continental Divide National Scenic Trail
CFR	Code of Federal Regulations
EIS	Environmental Impact Statement
FLPMA	Federal Land Policy and Management Act
HMP	Habitat Management Plan
NNL	National Natural Landmark
NWPS	National Wilderness Preservation System
OHV	Off-Highway Vehicle
RAMP	Recreation Area Management Plan
RMP	Resource Management Plan
USDI	United States Department of the Interior
USFS	United States Forest Service
WGFD	Wyoming Game and Fish Department
WSA	Wilderness Study Area

CHAPTER 1

PURPOSE AND NEED; ISSUES AND CRITERIA

PURPOSE AND NEED FOR ACTION

This EIS describes alternative management actions for three Wilderness Study Areas (WSAs) in the Great Divide Resource Area in Wyoming, and provides an analysis of the effects on the environment from these actions. The Bureau's preferred alternative is identified as the proposed action. The Federal Land Policy and Management Act of 1976 (FLPMA), under Section 603, directs the Bureau of Land Management (BLM) to inventory, study, and report to Congress, through the Secretary of the Interior and the President, the public lands preliminarily suitable for inclusion in the National Wilderness Preservation System (NWPS). In additional, other lands may be studied under Section 202 of that act. The Encampment River Canyon (WY-030-30) and Prospect Mountain (WY-030-303) are being studied under Section 202, while the Bennett Mountains (WY-030-304) is under Section 603 of FLPMA.

According to FLPMA, the Secretary must report his recommendations to the President by October 21, 1991. The President has until October 21, 1993, to send his recommendations to Congress; only Congress has the authority to designate any of the study areas as wilderness or release them from study status as nonsuitable.

WILDERNESS STUDY

The three WSAs covered by this EIS were identified during BLM's intensive wilderness inventory, which was completed in November 1980. The RMP process was initiated for the Medicine Bow and Divide Resource Areas in 1985. The Medicine Bow and Divide Resource Areas were combined into the Great Divide Resource Area in 1988 and a final RMP/EIS prepared under that name (Map 1). This EIS, in conjunction with congressional action, will complete the resource and land use guidance in the RMP for the Great Divide Resource Area.

The three areas being studied are located in Carbon County. The natural features in these areas are quite diverse, ranging from granite mountains nearly barren of vegetation to aspen/pine woodlands and deep, rugged canyons. Elevations range from a low of 6,600 feet in the Bennett Mountains to 8,545 feet on the ridges in the Encampment River Canyon.

These WSAs constitute less than one-half of one percent of the public land in the Great Divide Resource Area and cover a total of 11,695 acres. Table 1 lists the areas and acreages under wilderness study in this EIS for the Great Divide Resource Area. The total acreage in the Resource Area for WSAs is 66,940.

TABLE 1

LIST OF WILDERNESS STUDY AREAS

Wilderness Study Area	Acres[1]
Encampment River Canyon WY-030-301[2]	4,547
Prospect Mountain WY-030-303[2]	1,145
Bennett Mountains WY-030-304[3]	6,003
Total	**11,695**

[1] All lands within the WSAs are public lands. All minerals underlying the WSAs are federally owned.

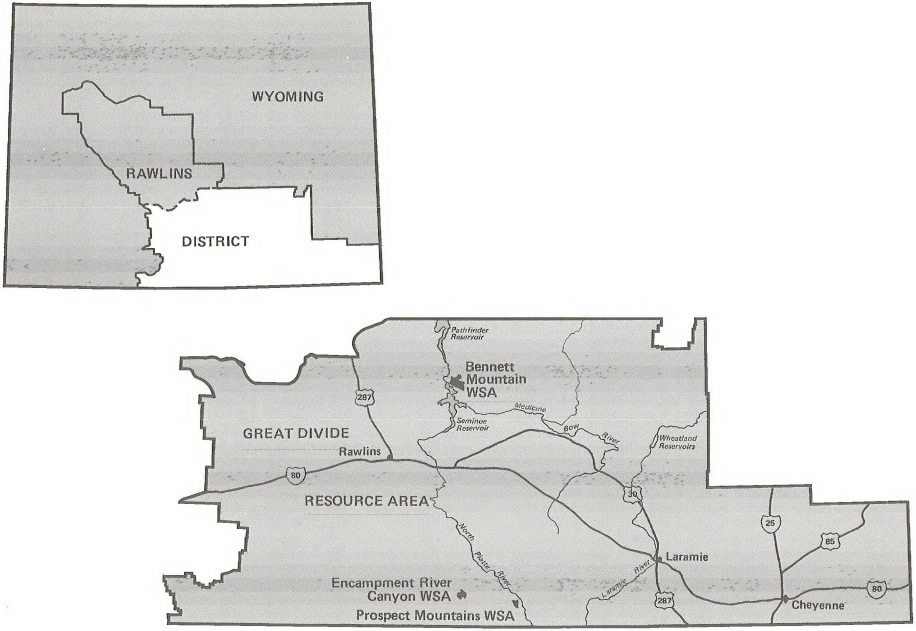
[2] Studied under Section 202 of FLPMA.

[3] Studied under Section 603 of FLPMA.

A wilderness management plan will be developed for each WSA that is designated, based on the site specific situation and any special wilderness management considerations identified in the Wilderness Legislation. Areas not designated as wilderness and released by Congress will be managed under provisions of the RMP without the constraints of BLM's Wilderness Interim Management Policy.

ENVIRONMENTAL ISSUE IDENTIFICATION AND SCOPING

Environmental concerns were identified through the scoping process. This process consisted of public meetings, contact with special interest group, governmental agencies at the federal, state, and local



Map 1
LOCATIONS OF WILDERNESS STUDY AREAS
Great Divide WSAs

levels and internal scoping by BLM. During the scoping process the following concerns were expressed about wilderness designation and its effect on:

1. Wilderness values, including naturalness, solitude, primitive and unconfined recreation, and special features.
2. Recreational opportunities, including the use of motorized vehicles, hunting, fishing, camping, and hiking.
3. Oil and gas exploration and development.
4. Locatable mineral exploration and development.
5. Big game habitat.
6. Livestock grazing and grazing management such as range developments and season of use, and ranch operations.
7. Wetland/riparian areas.
8. Timber harvesting.
9. Air quality.
10. Cultural resources.
11. Scenic values.
12. Water quality.
13. Adding acreage to the National Wilderness Preservation System (NWPS).
14. Adding diversity to the NWPS.
15. Extension of existing wilderness areas (Platte River).
16. Water projects.
17. Threatened and endangered species.

From the listed concerns, the following issues were considered significant and were selected to be analyzed in detail.

Issues Selected for Analysis

Encampment River Canyon WSA

1. Effects on the wilderness values of naturalness, solitude, and opportunities for primitive and unconfined recreation and special features.
2. Effects on OHV use.
3. Effects on big game habitat (deer, elk and bighorn sheep).
4. Effects on livestock range projects and ranch operations.

Prospect Mountain WSA

1. Effects on the wilderness values of naturalness, solitude, and opportunities for primitive and unconfined recreation and special features.
2. Effects on OHV use.
3. Effects on big game habitat (deer and elk).
4. Effects on timber harvesting.

Bennett Mountains WSA

1. Effects on the wilderness values of naturalness, solitude, and opportunities for primitive and unconfined recreation and special features.
2. Effects on OHV use.

Issues Not Considered for Analysis

The following concerns were identified as issues not requiring an in-depth analysis.

1. Oil and Gas Exploration and Development

   The oil and gas potential for all WSAs is "no to low." As a result, there is no exploration or development anticipated in any of the WSA regardless of wilderness designation. Therefore, this is not an issue for detailed analysis. See Chapter 3, Affected Environment for a summary of the mineral and energy potential.

2. Locatable Mineral Exploration and Development

   Although locatable minerals are present in all WSAs, they are not known to occur in commercial quantities. As a result, no exploration or development is anticipated regardless of wilderness designation. Therefore, this is not an issue for detailed analysis. See Chapter 3, Affected Environment, for a summary of the mineral potential.

3. Big Game in the Bennett Mountains WSA

   There are no management actions planned under the No Wilderness Alternative. Therefore, there would be no effect on the populations. Under the All Wilderness Alternative, the only management action would be an OHV closure and that action would effect less than 1% of the area, primarily during the hunting season. Therefore, it would have an insignificant effect on big game.

4. Livestock in the Bennett Mountains and Prospect Mountains WSAs.

The only action planned is an OHV closure in the All Wilderness Alternative and since vehicles are used very little in the WSA with the livestock operation activities, the effect would be insignificant.

5. Wetland/Riparian Areas

Wetland/Riparian areas do exist in each of the WSAs. The effect of management actions on wetland/riparian areas is discussed in the livestock grazing section of the Encampment River Canyon WSA. There are no management actions planned that would affect wetland/riparian areas in any alternative other than OHV closure under All Wilderness in the Prospect Mountain or Bennett Mountains Wilderness Study Areas. Therefore, there would be no effect on wetland/riparian areas in those WSAs.

6. Timber Harvesting

Conifer and deciduous trees exist in all of WSAs, and the effect on timber harvesting is discussed as a significant issue in the Prospect Mountain WSA. The forest is not merchantable in the Encampment River Canyon and Bennett Mountains WSAs. Therefore, timber harvesting was not considered to be an issue for detailed analysis in those two WSAs.

7. Air Quality

The air quality is excellent in all WSAs. There are no management actions planned in either the Proposed Actions or Alternatives that would create dust, smoke, or other pollutants. Therefore, there would be no effect on air quality.

8. Cultural Resources

Prehistoric cultural resources are not well documented in any of the WSAs, primarily because there have been no surface disturbing activities which have resulted in the conduct of inventories. However, should there be any activities, they would be constrained by decisions recorded in the Great Divide Resource Area's RMP. In addition, any actions would be subjected to compliance with Section 106 of the National Historical Preservation Act. Mitigation measures would be stipulated before the activity would be permitted. Disturbances other than those authorized would be subject to legal action. See Chapter 3, Affected Environment, for a description of the cultural resources known to occur in the WSAs.

9. Scenic Values

No management actions are proposed which would alter the landscape in either the Proposed Action or the Alternative. Therefore, there would be no effect on scenic values.

10. Water Quality

No management actions are proposed regardless of wilderness designation, including the restriction of OHVs, which would effect water quality. See Chapter 3, Affected Environment, for a description of water quality.

11. Adding Acreage to the National Wilderness Preservation System (NWPS)

The inventory phase in the wilderness process has been completed. However, adding acreage to the NWPS has been taken into consideration in developing alternatives and making suitability recommendations for a WSA, and as such is not addressed as an environmental issue in this EIS.

12. Adding Diversity to the National Wilderness Preservation System (NWPS)

Adding diversity to the NWPS has been taken into consideration in developing alternatives and making suitability recommendations for a WSA, and as such is not addressed as an environmental issue in this EIS.

13. Extension of Existing Wilderness Areas

Extension of existing wilderness areas is a consideration in developing alternatives and making suitability recommendations for a WSA, and as such is not addressed as an environmental issue in this EIS.

14. Water Development Projects

There are no water projects planned in any of the WSAs.

15. Threatened and Endangered Species

No T&E plant or animal species have been identified to occur in any of the WSAs. See Chapter 3, Affected Environment for further discussion and letter number 10 from the US Fish and Wildlife Service.

16. Recreational Opportunities Other Than OHV Use

No management actions are proposed in either the Proposed Actions or the alternatives that would affect recreational opportunities.

Environmental components commonly occurring but not present in the WSAs are: areas of critical environmental concern (ACEC), coal resources, nonenergy leasable minerals, floodplains, prime or unique farmlands, wetlands, wild horses, wild or scenic rivers (designated or proposed), features of Native American Religious concerns, and solid or hazardous wastes.

There are no lands and realty actions proposed or projected for the WSA.

DEVELOPMENT OF ALTERNATIVES

Alternatives to be considered in the wilderness study process were developed through public and BLM interactions. All reasonable alternatives were considered; some were carried forward and others dropped from consideration.

The No Wilderness alternative was carried forward because it is required by the National Environmental Policy Act (NEPA). For the purpose of this document, the No Wilderness and the No Action are considered identical. The All Wilderness alternative is reasonable since this is a study to determine whether wilderness designation is appropriate.

Alternatives Considered But Not Carried Forward for Detailed Analysis

Encampment River Canyon WSA

An alternative to recommend designation of only the Encampment River Canyon as wilderness was considered but not analyzed because of the WSA's small size (4,547 acres). Reducing the area to only the canyon would not significantly reduce resource conflicts, improve the quality of the resource values, or improve the WSA's manageability while maintaining essential wilderness values.

An alternative to enhance wilderness in the WSA by closing boundary roads and adding additional acreage was considered. This action would not be feasible since the roads are designated county or private roads that provide the only vehicle access to public and private lands in the area.

Prospect Mountain WSA

An alternative to recommend designation of part of the WSA as wilderness was suggested, but not analyzed because of the WSA's small size (1,145 acres). Reducing its size further would not significantly reduce resource conflicts, improve the quality of the resource values, or improve the WSA's manageability while maintaining essential wilderness values.

An alternative to enhance wilderness in the WSA by closing boundary roads and adding additional acreage to this WSA was considered. However, due to topographic features, there is no feasible way to do this. In addition, the area outside of the WSA does not have the wilderness characteristic of naturalness because of existing intrusions which include old mine pits, roads and fences.

Bennett Mountains WSA

An alternative to recommend designation of part of the WSA as wilderness was considered, but not analyzed because of the WSA's small size (6,003 acres). Reducing its size further would not significantly reduce resource conflicts, improve the quality of the resource values, or improve the WSA's manageability while maintaining essential wilderness values.

An alternative to increase acreage in the WSA by closing boundary roads and enlarging the boundary was considered. However, there are no feasible opportunities to do this, because the area outside of the WSA does not have the wilderness characteristic of naturalness because of existing intrusions which include powerlines and roads.

CHAPTER 2

ALTERNATIVES

INTRODUCTION

Not all future actions within the three WSAs can be predicted with certainty. Therefore, in the absence of specific proposals, assumptions were made to provide a basis for assessing the Environmental Consequences of the various alternatives being analyzed.

ENCAMPMENT RIVER CANYON WSA (WY-030-301)

The Proposed Action is different from the draft EIS. All Wilderness is the Proposed Action.

No Wilderness Alternative

None of the 4,547 acres in the Encampment River Canyon WSA would be designated wilderness. Management actions proposed in the WSA are:

Recreation Management Actions

Off highway vehicle (OHV) use would continue to be excluded from the entire WSA during the winter, December 1 to April 30. During the remainder of the year approximately 1,000 visitors using vehicles would be limited to about one mile of existing roads and trails (see Map 2). The Encampment River Trail would remain closed to motorized traffic all year. The trail will continue to be maintained by the US Forest Service.

Wildlife Habitat Management Actions

About 600 acres of mountain shrub/aspen big game habitats would be treated through prescribed spring burning possibly with the use of motorized equipment for suppression action (see Map 3).

Two wildlife guzzlers would be installed (see Map 4).

Livestock Grazing Management Actions

The existing level of 402 AUMs of livestock grazing use would continue to be authorized unless changed as a result of range monitoring studies.

No range improvement projects are planned; however, it is anticipated that livestock operators would propose the following projects for livestock management purposes, consequently they are projected for analysis: (a) two spring developments using native materials; and (b) five miles of allotment boundary fencing designed for "let-down" and located in a way to be screened from view (see Map 5). The existing one and one half miles of fence will continue to be maintained.

Proposed Action (All Wilderness)

Under this alternative, the entire Encampment River Canyon WSA (4,547 acres) would be designated as wilderness.

Management actions for recreation, wildlife, and livestock grazing would be constrained to ensure that wilderness values were not impaired.

Recreation Management Actions

The entire WSA would be closed to OHVs. Approximately 500 visitors currently involving OHVs would occur without the benefit of motorized vehicles.

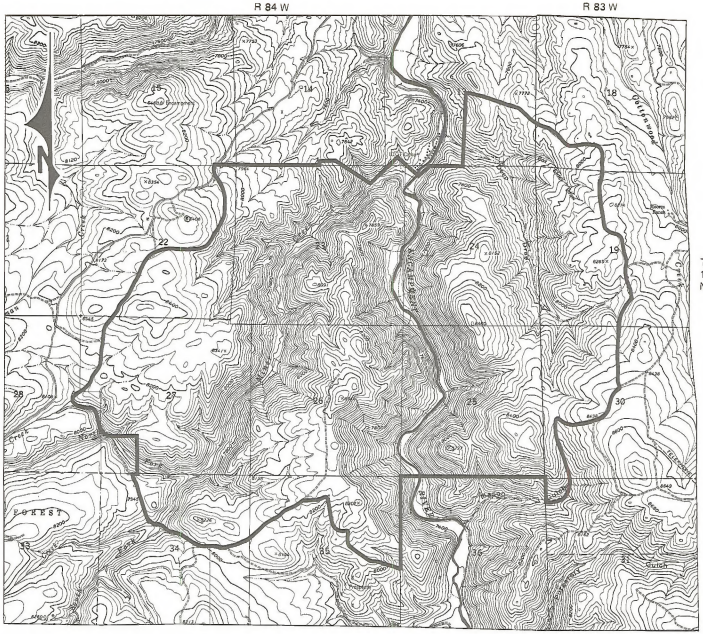
Wildlife Habitat Management Actions

About 600 acres of mountain shrub/aspen big game habitat would be treated by prescribed spring burning without the use of motorized equipment for suppression.

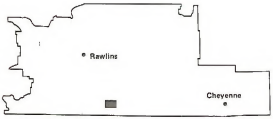
Livestock Grazing Management Actions

The existing level of 402 AUMs of livestock grazing use would continue to be authorized unless changed as a result of range monitoring studies.

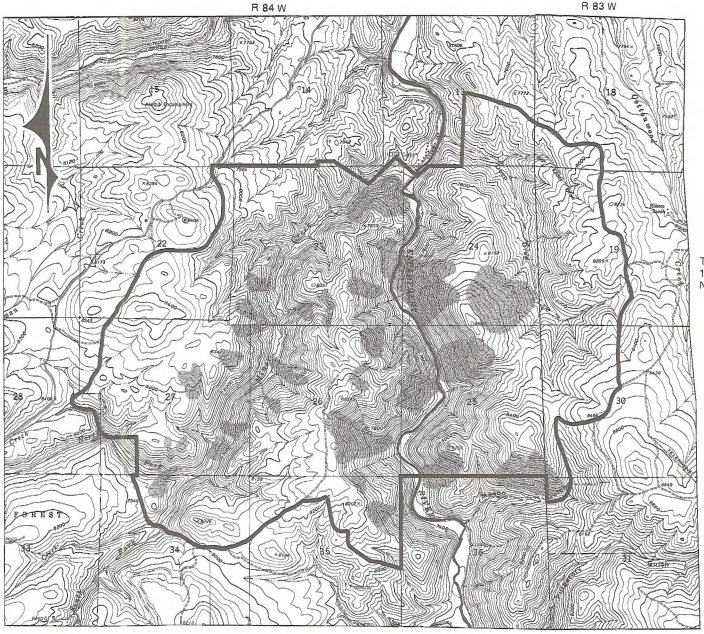
No range improvement projects are planned; however, it is anticipated that livestock operators in the area would propose projects for livestock management purposes within the WSA. It is anticipated that two springs using native materials and the construction of approximately five miles of allotment boundary fence designed for "let-down" would be needed to implement management systems on the four allotments. All projects would meet nonimpairing wilderness requirements and would be screened from view as much as possible. Motor vehicle access would be limited to emergencies and when absolutely necessary to maintain range improvements.



Encampment River Canyon WSA Boundary



Map 2
BOUNDARY, ROADS, AND TRAILS
Encampment River Canyon WSA



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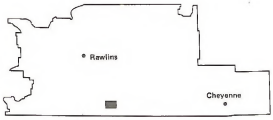
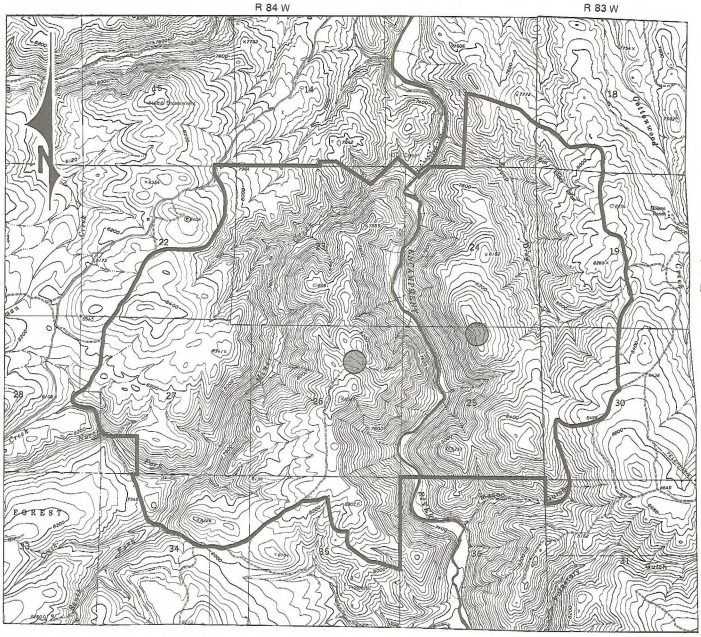
SCALE IN MILES

Encampment River Canyon WSA Boundary

Prescribed Burn Area

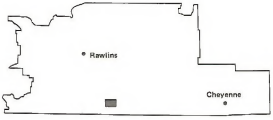


Map 3
POTENTIAL PRESCRIBED BURN AREA
Encampment River Canyon WSA

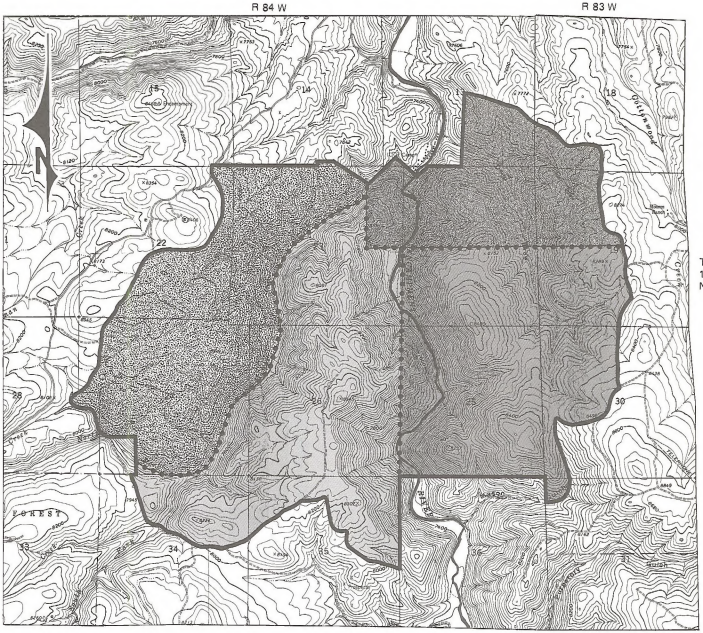


Encampment River Canyon WSA Boundary

Wildlife Water Guzzler



Map 4
POTENTIAL LOCATION FOR WILDLIFE WATER GUZZLERS
Encampment River Canyon WSA



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SCALE IN MILES

Encampment River Canyon WSA Boundary

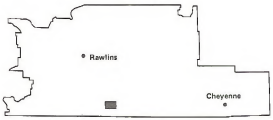
Proposed Fence

Bar M Ranch Grazing Allotment

1010 Herring Grazing Allotment

1017 Cottonwood Grazing Allotment

1029 Saulcy Grazing Allotment



Map 5
LIVESTOCK GRAZING ALLOTMENTS
Encampment River Canyon WSA

The one and one-half miles of existing fence within the WSA would continue to be maintained.

PROSPECT MOUNTAIN WSA (WY-030-303)

Proposed Action (All Wilderness)

All of 1,145 acres in the Prospect Mountain WSA would be designated as wilderness (see Map 6).

Recreation Management Actions

The entire WSA would be closed to OHVs. A little more than 1 mile of two-track trails presently open to OHVs. 500 visitors would be affected.

Wildlife Habitat Management Actions

Prescribed burning or cutting to increase perennial grass production and to stimulate important shrub communities would be done on approximately 120 acres of mountain shrub/aspen habitats, using hand tools. No motorized equipment would be used.

Forest Management Actions

Under this alternative, there would be no forest management actions and no harvest of forest products.

No Wilderness Alternative

None of the 1,145 acres in the Prospect Mountain WSA would be designated as wilderness.

Recreation Management Actions

OHV use would be limited to existing roads and trails. A little more than one mile of two-track trails would remain available for OHV use.

Wildlife Habitat Management Actions

Prescribed burning or cutting with power equipment to increase perennial grass production and to stimulate important shrub communities would be accomplished on approximately 120 acres of crucial elk winter range (Map 7). Motorized equipment could be used.

Forest Management Actions

Under this alternative the forest resource would be managed for the production of wood fiber within multiple-use constraints. Forest management activities would include commercial sawlog timber sales, corral pole and fence post sales, individual fuelwood sales, and precommercial thinning (Map 8).

The productivity of this area is about 60,000 board feet per year of conifer on a sustained basis under intensive management. However, small harvest volumes on an annual basis is not feasible because of the economics of logging. Therefore, harvests would take place approximately every 20 years. The proposed schedule and volumes of harvest is detailed on Table 3.

Approximately 300 acres would be harvested over the next 60 years by the clearcut logging method. No single clearcut would be over 25 acres in size. These clearcuts would be scattered throughout the area to eventually provide a mosaic of timber stands in four different age classes. The actual sites of the clearcuts would not be determined until a timber sale was prepared. A harvest of 1 million board feet is recommended as soon as possible to control the current mountain pine beetle activity.

Timber harvesting would be prohibited from December 1 to April 30 of each year to avoid disturbances for the wintering elk herd. This restriction could be waived during mild winters. In this event, a multiple resource evaluation would take place, including consultation with the Wyoming Game and Fish Department, to determine severity of impacts on the wintering elk population. The area would also be closed to logging from May 10 to June 15 to avoid disturbance to calving elk.

Precommercial thinning would occur when the regenerated stands are about 25 years old. Another harvest of the stand through clearcutting would occur when the stand reaches 100 years of age.

BENNETT MOUNTAINS WSA (WY-030-304)

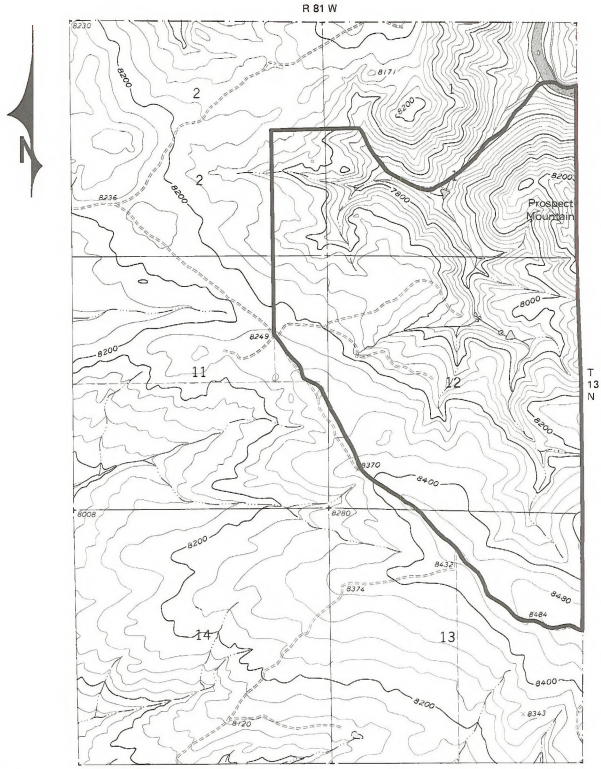
Proposed Action (No Wilderness)

None of the 6,003 acres in the Bennett Mountains WSA would be designated as wilderness (Map 9).

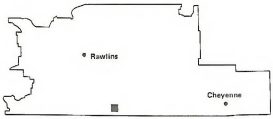
TABLE 2

SUMMARY OF IMPACTS
Encampment River Canyon WSA

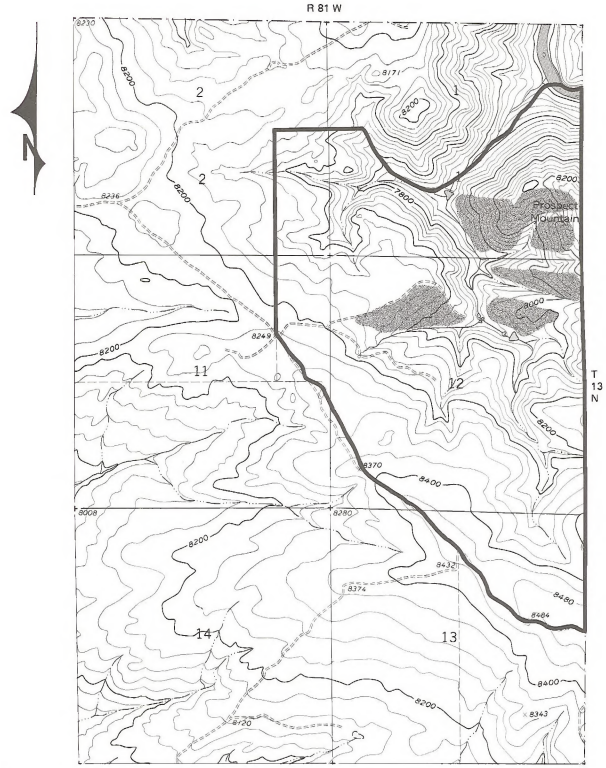
Issues	No Wilderness Alternative	Proposed Action (All Wilderness)
Naturalness	Prescribed burning would destroy naturalness for 1-3 years on approximately 1,200 acres. OHV use in the upland would have a negative effect from May 1 to November 30 on about 500 acres. Range improvement projects would destroy naturalness in the immediate vicinity (2-3 acres).	Prescribed burning would destroy naturalness for 1-3 years on approximately 1,200 acres. Closing OHV use yearlong would have a positive effect on 500 acres. Range improvement projects would have a negative effect on 2-3 acres.
Outstanding Opportunities for Solitude and/or Primitive Unconfined Recreation	Prescribed burning would have a negative effect for 2-3 weeks in the spring but few visitors are present. OHV use in the uplands would have little effect because most visitation is on the canyon trail. Range projects would destroy solitude during construction. Cattle use in the area would have a negative effect on primitive, unconfined recreation.	Prescribed spring burning would have a negative effect for 2-3 weeks on solitude, but few visitors are present. Closing OHV use yearlong would have a minor, but positive effect. Range projects would destroy solitude during construction. Cattle use would have a negative affect on primitive, unconfined recreation.
Special Features	There would be no negative affects anticipated on special features because surface-disturbing activities are not expected.	There would be positive effects on special features because there would be no degrading actions.
Recreational Opportunities	Vegetative manipulation would have a positive effect on bighorn sheep viewing because of an anticipated increase in numbers. Cattle-visitor conflicts would continue even though range improvements would result in better cattle distribution.	Vegetative manipulation would have a positive effect on bighorn sheep viewing because of an anticipated increase in numbers. There would be no motorized recreation. There would be continued visitor/cattle conflicts.
Big Game Management	Winter closure of OHVs would have a positive effect on big game as would prescribed burning and installation of guzzlers. Bighorn sheep numbers may increase to 150 head. Range improvement projects would have little effect.	Yearlong OHV closure would have a positive effect on big game by reducing harassment. Big game habitat would be enhanced and an increase in big horn sheep numbers is expected.
Livestock Management	There would be no negative effects on livestock management from management actions in this alternative.	There would be a negative effect on livestock management because of the restriction on the use of motor vehicles.



Prospect Mountain WSA Boundary



Map 6
BOUNDARY, ROADS, AND TRAILS
Prospect Mountain WSA



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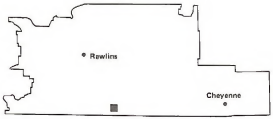
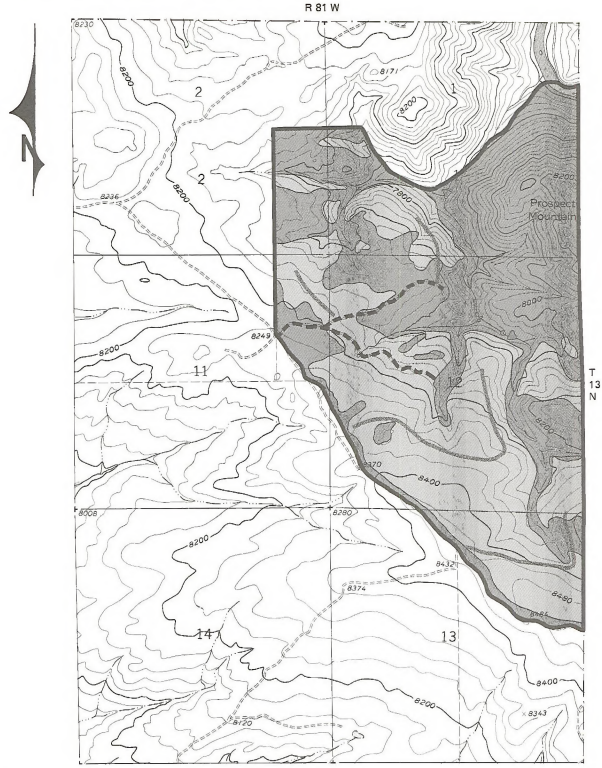
SCALE IN MILES

Prospect Mountain WSA Boundary

Prescribed Burn Area



Map 7
POTENTIAL PRESCRIBED BURN AREA
Prospect Mountain WSA



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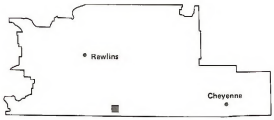
SCALE IN MILES



Prospect Mountain WSA Boundary

Area Suitable for Forest Management

Area Unsuitable for Forest Management

Planned Two-track Upgrading

Planned Temporary Road Construction

Map 8
FOREST MANAGEMENT
Prospect Mountain WSA

TABLE 3

PROPOSED TIMBER SALES IN PROSPECT MOUNTAIN WSA

Year from Present	Estimated Volume (MMBF)	Acres of Harvest	Method of Logging	Miles of Road Upgrading	Miles of Temporary Road Construction
As soon as possible	1	75	Clearcut	1-1/4	1/2
20	1/2	75	Clearcut	0	1-1/4
40	1/2	75	Clearcut	0	1
60	1/2	75	Clearcut	0	3/4
Totals	**2.5 MMBF**	**300**		**1-1/4**	**3-1/2**

Recreation Management Actions

OHV use would be limited to existing roads and trails. Approximately four miles of discontinuous two-track trails would be available for OHV use. The 500 visitor days for recreation are expected to continue, all associated with OHV use.

Livestock grazing, wildlife use, and non-motorized recreation occur in the WSA, but no management action are planned that would affect these uses.

All Wilderness Alternative

All of the 6,003 acres in the Bennett Mountains WSA would be designated as wilderness.

Recreation Management Actions

The entire WSA would be closed to OHVs. Approximately four miles of discontinuous, seldom used, two-track trails currently available for OHV use would be closed. The OHV use would be displaced to adjacent areas outside the WSA.

Recreational use was estimated to be 500 visitor days in 1985. This level of use is expected to remain constant in the future with non-motorized forms of recreation replacing motorized recreation displaced by the OHV closure.

TABLE 4

SUMMARY OF IMPACTS
Prospect Mountain WSA

Issues	Proposed Action (All Wilderness)	No Wilderness
Naturalness	Prescribed burning on 120 acres would have a negative effect for two to five years.	OHV use would have a negative, though minor, effect. Prescribed burning would have a negative effect on 120 acres for two to five years. Forest management activities would impair naturalness.
Outstanding Opportunities for Solitude and/or Primitive Unconfined Recreation	Prescribed burning would be noticeable for about one year.	OHV use would have a negative, though minor, effect. Forest management activities would impair solitude during harvest and would have long-term, negative effects on primitive, unconfined recreation.
Special Features	Effect of burning on scenery would have a negative effect for two to five years on about 250 acres.	OHV use, prescribed burning, would have a negative effect on scenery on about 500 acres for two to five years. Forest Management practices would have a negative affect on scenery on about 500 acres.
Recreational Opportunities	OHV users (about 500 visits/year) would be negatively effected.	Timber management practices would displace recreationists for two months in the summer every 10 years.
Big Game Management	There would be a minor, positive effect from OHV closure. Prescribed burning on 120 acres would have a positive effect on crucial elk winter range.	Prescribed burning would have a positive effect on crucial elk winter range.
Forest Management	There would be a natural forest species conversion from lodgepole pine to spruce fir. Fire hazard would increase. Productivity and health of the forest would be less than optimal. Two and one half million board feet of lumber would not be produced.	There would be little species conversion and less diversity in the forest. Fire hazard would be lessened. Two and one half million board feet of lumber would be harvested.

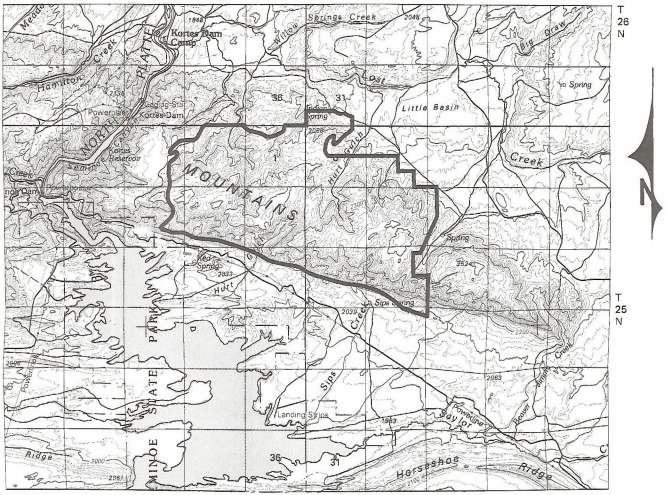

T 26 N
T 25 N
R 84 W
R 83 W
Korter Dam Camp
Korter Dam
Hamilton Creek
Middle Creek
Willow Springs Creek
Big Draw
Little Basin
Spring
Creek
Hull Hollow
Spring
Spring
Spring

TABLE 5

SUMMARY OF IMPACTS
Bennett Mountains WSA

Issues	Proposed Action (No Wilderness)	All Wilderness
Naturalness	OHV use is low and would have little effect.	No OHV use would have a minor, positive effect.
Effects on Opportunities for Solitude and/or Primitive Unconfined Recreation	OHV use is low and would have little effect.	No OHV use would have a minor, positive effect.
Special Features	There would be no adverse effects on scenery except for about 200 acres affected by the 4 miles of road.	There would be no adverse effects on scenery.
Recreational Opportunities	Use and values would change very little.	Two hundred and fifty (250) visits/year by OHV users would be eliminated, but could be accommodated in nearby areas.

CHAPTER 3

AFFECTED ENVIRONMENT

ENCAMPMENT RIVER CANYON WSA

Introduction

Threatened or endangered species would be unaffected by the management alternatives for the WSA. Endangered bald eagles and peregrine falcons may use the WSA on occasions when hunting or migrating through the area, but the WSA contains no breeding, nesting, or wintering habitat that would be essential to the recovery of either species. The area does not contain any prairie dogs, primary food of black-footed ferrets, so the existence of ferrets in the WSA is unlikely (see attached comment letter from the US Fish and Wildlife Service, number 10 in Chapter 5).

General Description

The Encampment River Canyon WSA is located in southern Carbon County, approximately two miles south of Encampment, Wyoming and one mile north of the U.S. Forest Service Encampment River Wilderness.

The topography of the entire unit is mountainous. Steep canyons and rocky slopes dominate the vistas. The Encampment River and a major tributary, Miner Creek, add scenic features to the WSA. Elevations range from 7,200 feet along the Encampment River to 8,545 feet on the high ridges.

Approximately 10 percent of the WSA is forested. Tree species present include limber pine, lodgepole pine, Douglas-fir, subalpine fir, cottonwood and aspen. They occur in pure and mixed stands scattered throughout the WSA, but are not merchantable.

Lower elevations and drainages are characterized by narrow belts of deciduous trees (cottonwoods, willows, alders), coniferous trees (Douglas-fir, true firs, junipers, and limber pine), grasses, and forbs bordering the Encampment River.

The middle elevations and rocky slopes are primarily composed of a mosaic of bunchgrass with small shrubs (sagebrush, mountain mahogany, bitterbrush, serviceberry) on steep canyon slopes, and small fingers of trees in the draws and gullies. This mosaic of vegetation has been influenced by wildfires and through differing aspects of the canyon.

The upper elevations and high ridges above the canyon rim generally include the same species as the middle zone, but with smaller proportions of shrubs and less dense stands of grass.

Access to the WSA is very good as public roads are available to most of the boundary. In winter the area can be reached by snowmobile or by cross country skis.

Wilderness Values

Size

The Encampment River Canyon WSA contains 4,547 acres of contiguous public land. The original reported acreage of 3,380 was in error and has been corrected to 4,547 acres. No private or state inholdings, and no split-estate lands are located within the WSA boundary.

Naturalness

Most of the WSA is in a relatively natural state. A fence line crosses one half of the WSA, but its location is not intrusive except at one place on the hiking trail that parallels the river. The area also has a few two-track trails, remains of two old cabins and the washed out remains of a river dam, numerous prospect pits and tunnels, and the remains of a wooden pipeline. These intrusions have weathered for many years and now blend into the overall view. They do not detract significantly from the natural values. Except for two piles of mine tailings and the washed-out dam, the intrusions are not noticeable from a distance. They do not seriously impair the wilderness character of the WSA.

The International Order of Odd Fellows (IOOF) has developed a private parcel of land adjacent to the WSA along the river; however, due to screening provided by trees, rock outcrops, and steep canyon walls, the area is not noticeable from within the WSA. The development does not impair the wilderness character of the WSA.

Upstream from the WSA, the USFS Encampment River Wilderness encompasses a large portion of the Encampment River drainage. Further upstream, on Forest Service administered land in Colorado, the river is proposed for wild and scenic river designation.

Outstanding Opportunities for Solitude and/or a Primitive Unconfined Type of Recreation

The WSA offers outstanding opportunities for solitude in the canyon. The deep canyons and high rocky ridges provide topographic screening, and the vegetation of the area contributes further screening. At current and projected levels of use visitors to the area would have occasional encounters along the trail, which would reduce the level of solitude. The portion of the WSA above the canyon is accessible by vehicles and solitude qualities are diminished.

Opportunities for primitive and unconfined recreation are outstanding. The public currently uses the area for hiking, backpacking, horseback riding, hunting, fishing, rockhounding, wildlife viewing, photography, and sightseeing. The section on "Recreation Resources" contains a discussion of current recreational use in the WSA.

The Wyoming Game and Fish Department (WGFD) has classified the Encampment River as a Class 2 Stream which means that it is very good trout water with statewide importance.

The Encampment River Trail, which is managed by the U. S. Forest Service (USFS) thru the BLM lands, parallels the river and provides access to the entire length of the river. The trail is closed to motorized vehicle use year-round, and the entire WSA is closed to motorized traffic in the winter for big game protection.

The trail also has been mentioned as a potential connector trail to the Continental Divide National Scenic Trail (CDNST) to which it may intersect when the CDNST route is established.

The trail provides access to the USFS Encampment River Wilderness, which is upstream. Conflicts between cattle and campers occur along the trail because cattle congregate in some of the best campsites (relatively flat areas near water). Vegetation in these areas has been reduced, and concentrations of cow manure have led to aesthetic, sanitation, and insect problems.

In conjunction with the trail, the BLM has developed and maintains the Encampment River Trailhead just outside the WSA. This trailhead provides a restroom, parking, picnicking and primitive camping facilities. The trailhead enhances opportunities for primitive recreation within the WSA by improving access.

Special Features

The Encampment River Canyon contains sites associated with early exploration and mining activities of regional historical importance.

Recreational gold panning continues to be a significant activity.

A one-mile-wide corridor along the Encampment River is proposed for National Natural Landmark (NNL) designation. A portion of the proposed NNL lies within the WSA.

Recreational Resources

The Encampment River Canyon WSA offers opportunities for a great variety of recreational activities, including fishing, hunting, backpacking, hiking, horseback riding, wildlife viewing and photography, camping, rock hounding, and sightseeing. The river canyon attracts recreationists from Wyoming and the neighboring states of Colorado, Nebraska, and Utah.

Access to the WSA is very good either by vehicle, on foot or on horseback. The Encampment River Trail provides access to the USFS Encampment River Wilderness, which lies upstream. Development of the Encampment River Trailhead, just outside the WSA, began in 1980. A bridge was constructed at the trailhead. Prior to that, the trail was accessible to foot traffic by wading the river. The trail is heavily used throughout the warmer months. According to counter readings, the trail's popularity has grown each summer since development of the trailhead. In 1983, the use was estimated at 2,000 visitors. By 1984 this figure had doubled. Trail use is projected to level off at about 6,000 visitors within the next five years.

The trail is closed to motorized vehicle use year-round, and the entire WSA is closed to motorized traffic in the winter (December 1 to April 30) under an emergency (temporary) OHV closure.

Fishermen have excellent foot access upstream via the Encampment River Trail. All waters within the study area are open to yearlong fishing. There is a lack of data on exact fishing use and harvest. Available estimates indicate that there are 20 visitor days devoted to fishing per mile, per year on the Encampment River and 5 visitor days per mile, per year on Miner Creek. This equals 50 visitor days per year on the Encampment River and 17.5 visitor days per year on Miner Creek within the WSA. These figures are

probably low in light of the increased use of the Encampment River Trail since development of the trailhead. Approximately 15 to 20 percent of the visitor use on the trail is associated with fishing.

Over the past few years, kayakers and tubers have begun to use the river during spring runoff, as it provides an exciting float trip.

Hunting, especially for mule deer, is very popular within the WSA as, locally, it is considered a potential trophy area. Bighorn sheep are presently closed to hunting due to low numbers and problems thought to be associated with habitat quality.

Other recreational use of the WSA includes OHV use (during nonrestricted periods), horseback riding, and sightseeing, particularly of bighorn sheep.

Recreational use away from the Encampment River Trail is estimated at 2,000 visitors per year. About half of this involves the use of OHVs. The estimated total visitors/year in the WSA is 8,000.

Wildlife Resources

The Encampment River Canyon WSA provides habitat for a wide variety of game and nongame wildlife. A list of these species is available at the Rawlins BLM District Office, but was not included in this EIS because of the large volume of information that would be of interest to a limited number of people.

Portions of five big game herd units (2 antelope, 1 elk, 1 mule deer, and 1 moose) occur in the WSA. A variable number of animals from each herd use the WSA throughout the year.

The entire Encampment River Canyon WSA is part of a larger crucial winter range for bighorn sheep. The Encampment bighorn sheep herd has generated a great deal of interest recently because of its dramatic decrease in size. In 1976 and 1977, 68 bighorn sheep were introduced into the Encampment River Canyon. The population increased to approximately 135 by the fall of 1983. During the winter of 1983-1984 the population sustained a 25 percent loss because of the severe winter weather. From 1984 to 1986 the population decreased from 102 to 40-60 animals (Rudd 1986). WGFD reports indicate that the reduction may have been due to habitat quality; disease; competition from elk, mule deer, antelope, and cattle; and harassment by off-road vehicles.

Studies in different areas indicate that harassment by humans can play a significant role in such a reduction in bighorn sheep numbers, especially if the harassment occurs during the winter. The Encampment bighorn sheep herd has historically concentrated on crucial range in the WSA during the winter. Concern over the decline of the herd led to the authorization in 1986 of an emergency (temporary) OHV closure in the area from December 1 to April 30. The environmental assessment for the emergency closure (number WY-033-0213) contains a more detailed discussion of the effects of harassment on bighorn sheep. A copy may be obtained from the BLM's Rawlins District office.

Ewes from this herd also use a lambing area in the WSA, where steep, rocky slopes provide security from predators. Forage availability and quality of the crucial winter range is essential to the viability of the population.

The area is covered by a 1976 Habitat Management Plan (HMP) that is scheduled for revision in 1989-1990.

Competition occurs among bighorn sheep, elk and cattle due to season-long use by wildlife and summer use by livestock (Haas 1979). Much of the generally more productive side slopes are unavailable to cattle (due to terrain) and to wildlife (due to snow distribution patterns). As a result, use is concentrated on the generally less productive flat benches and the snow-free southwesterly exposures.

While deer and elk will disperse as much as possible to utilize high quality available forage in adjacent areas, bighorn sheep are habitual by nature. They tend to congregate in well-defined areas and utilize all available forage before they disperse to other areas. Cattle also tend to congregate in well-defined areas, and their concentrations compound the problem of competition for forage.

The WSA is also used throughout the year by mule deer. The northern half of the WSA encompasses a small portion of the crucial winter range required by the Platte Valley mule deer herd. Mule deer numbers vary from 100 to 500 head depending on the time of year and the severity of the winter. Deer concentrate on the lower elevation crucial winter range (where forage availability is critical during winter) when summer range on the national forest is unavailable. Mule deer depend on the extensive aspen and riparian habitat sites for spring fawning.

In addition, the WSA is used by 150 to 300 head of elk from the WGFD's Baggs Herd Unit. The northern half of the WSA is used by elk primarily during the winter months. The southern half is part of a much larger crucial winter-yearlong range considered to be essential to 10 to 15 percent of the Baggs elk herd (Moody 1985).

The WSA contains high-value aspen, mountain shrub, and riparian habitat sites used by up to 165 wildlife species. The aspen habitat sites are primarily scattered in small stands on slopes and exposures where snow concentrates and total about 140 acres.

Aspen habitat is normally maintained by fire or other disturbances. In most areas of their occurrence within the WSA, aspen stands are rapidly being invaded by conifers because of a lack of fire or other disturbance. Much of the aspen is decadent and diseased and in need of habitat manipulation if it is to be maintained and/or improved.

Mountain shrub habitat sites are found throughout the WSA and compose a large portion of the non-forest vegetative community. These mountain shrub sites are important to wintering big game by providing much of their wintering diet. They are presently in fair to poor condition and the potential exists to increase the quality and quantity of these sites for wildlife through prescribed burning.

Riparian habitat sites are present along the banks of the Encampment River and tributary drainages in the WSA and total about 110 acres. Riparian sites are highly productive in terms of plant and animal species diversity, vegetation structure and biomass, and they are important to wildlife because of their limited availability. Within the WSA, some riparian areas are heavily utilized by livestock and wildlife. As a result, plant vigor has decreased and species composition has been changed so that the sites are not producing at their full potential.

Livestock Grazing

Four operators graze livestock (cattle) within the boundary of the Encampment River Canyon WSA. The cattle tend to concentrate along the river bottoms and associated riparian zones and ridge tops. The upper reaches of the WSA are accessible but tend to be lightly grazed due to the steepness of the canyon walls and lack of available water away from the drainage bottoms. There are four grazing allotments in the area that are made up in part by lands in the Encampment River Canyon WSA.

Only one fence exists within the WSA. This fence, which partially separates two allotments, has the potential to control drift of cattle. However, due to the lack of effective barriers, cattle congregate and spend the majority of the grazing season (May through October) in the same localized areas. Utilization within the WSA, as a result of this concentrated use, varies considerably between the riparian zones and the side slopes and ridges. The operators place supplemental salt along the ridges and upper reaches of the WSA in an attempt to better distribute grazing use.

Cattle within the WSA compete for forage with elk, deer, and bighorn sheep. Due to a lack of available data, it is unclear how this competition has affected the overall availability of forage.

Herding and checking of cattle is done by horseback and four-wheel drive vehicle on the existing two-track trails in the WSA. Conflicts exist between cattle and people using the Encampment River Trail for recreation (see "Recreation Resources").

Table 6 lists and describes the grazing allotments, including a breakdown of federal acres and animal unit months in the WSA, and in the allotments as a whole.

Map 5 shows the four allotments as they lie within the WSA boundary.

Mineral Resources

Although there are mining claims in the WSA, Ryan (1988) states that, "Although numerous prospects pits are present, no mineral resources were identified during the Bureau's investigation of the Encampment Wilderness Study Area. Copper and manganese were present in several widely spaced samples; however, these elements were not found in sufficient quantities to indicates a resource. Similarly, silver and gold were present in low concentrations and do not represent a resource. No sand and gravel deposits exist in sufficient quantity to constitute a resource. Extensive metamorphic rocks in the area are not conducive to the accumulation of hydrocarbons."

Cultural Resources

The Encampment River Canyon WSA is within an historical mining district. Included within the WSA and primarily in the canyon are remnants of prospect pits, open and closed mine shafts, tailing piles, log cabins, and a collapsed bridge across the river. Probably the most significant historic cultural feature is a washed-out dam and associated wooden pipeline which provided a water supply for a 1900's vintage copper smelter in Encampment. Stone foundations for the pipeline remain as well as trenched areas. Following a fire in 1986, large iron hoops from the pipeline were discovered, but they have since disappeared.

Although no prehistoric sites have been recorded, the potential is good along the river, river terraces, and near springs. Flat upland sites may also hold potential for prehistoric sites.

Water Resources

There are no data available on water quality from samples taken in the WSA. However, the U.S. Geo-

TABLE 6

LIVESTOCK GRAZING ALLOTMENTS IN THE ENCAMPMENT RIVER CANYON WSA

Number	Allotment Name	Season of Use	Kind of Livestock	Total Federal Acres	Number of Federal Acres in WSA	Percent of Federal Acres in WSA	Total Federal AUMs	Number of Federal AUMs in WSA	Percent of Federal AUMs in WSA
1008	Finch Ranch	Spring-Summer	Cattle	1,919	1,101	57	138	79	57
1010	Herring	Summer	Cattle	1,898	1,425	75	165	124	75
1029	Saulcy	Summer	Cattle	3,172	1,236	39	291	113	39
1017	Cottonwood	Summer-Fall	Cattle	1,966	767	39	220	86	39

logic Survey maintains sampling stations approximately 11 miles upstream from the WSA. The following data are derived from those sample locations.

Mean annual maximum flow in the Encampment River above Hog Park Creek is 159 cubic feet per second. Mean annual minimum flow is 51 cubic feet per second. Mean annual flow is 117 cubic feet per second. The maximum flow recorded at this gage was 1,280 cubic feet per second. The least daily flow recorded was 9.5 cubic feet per second.

At the mouth of the Encampment River near Encampment, Wyoming, the mean annual maximum flow is 337 cubic feet per second. The mean annual minimum flow is 129 cubic feet per second. The mean annual flow is 227 cubic feet per second. The maximum flow recorded was 4,510 cubic feet per second and the minimum daily flow recorded was 5.3 cubic feet per second.

Highest flows occur during May, June, and July from snow melt runoff.

Water quality of the Encampment River is for the most part within EPA and State of Wyoming water quality standards. There are, however, a few parameters where water quality standards are exceeded.

At the mouth of the Encampment River near Encampment fecal coliform bacteria counts generally exceed the standards required for a primary source for public water supply. Standards are usually exceeded by 15 to 85 percent during the month of September.

The Encampment River above Hog Park Creek has concentration of copper, lead, and cadmium that exceed standards for warm and cold water fisheries and for a public water supply. Standards are exceeded for most of the year by more than 85 percent. Concentrations of silver exceed standards for a warm and cold fisheries by more than 86 percent. Manganese concentrations exceed public water supply standards usually only during September by less than 85 percent. High concentrations of these elements are probably due to past mining activities within the watershed.

Generally speaking the river supports a healthy population of trout and is considered a high quality fishery. Neither the Proposed Action (No Wilderness) or the All Wilderness Alternative would be expected to change the quality of the water in the Encampment River Canyon WSA and water quality will not be analyzed further in this EIS.

PROSPECT MOUNTAIN WSA

Introduction

There are environmental components found elsewhere that are not present in this WSA. Environmental components not present in the WSA are areas of critical environmental concern (ACEC), coal resources, nonenergy leasable minerals, floodplains, prime or unique farmlands, wetlands, wild horses, and wild or scenic rivers (designated or proposed), Native American Religious concerns, and solid and hazardous materials.

Threatened or endangered species would be unaffected by the management alternatives for the WSA. The Prospect Mountain WSA is within the range of the bald eagle, peregrine falcon, and black-footed ferret, which are protected by the Endangered Species Act of 1964 (as amended). However, no documented observations of these three species have been made in the WSA. Bald eagles may occasionally use the area during the winter for hunting. Peregrines are believed to migrate through the area in late fall and early spring. However, the WSA contains no breeding, nesting, or wintering habitat that would be essential to the recovery of either species. The area does not contain any prairie dogs, primary food of black-footed ferrets, so the existence of ferrets in the WSA is unlikely (see attached letter number 10 from the U.S. Fish and Wildlife Service in Chapter 5).

General Description

The Prospect Mountain WSA is located in southern Carbon County approximately 16 miles southeast of Encampment, Wyoming, and 8 miles north of the Colorado-Wyoming border, along the southwestern flank of the Snowy Range, Medicine Bow Mountains. Elevations range from 7,400 feet along the North Platte River to 8,430 feet on Prospect Mountain. The WSA is 70 percent forested.

Access is provided by a primitive public road that originates three miles west of the WSA boundary on State Highway 230. During most of the winter, the WSA is inaccessible except by snowmobile.

The Prospect Mountain WSA is adjacent to the U.S. Forest Service (USFS) Platte River Wilderness, which shares its eastern boundary.

Wilderness Values

Size

The Prospect Mountain WSA contains 1,145 acres of public land. No private or state inholdings and no split-estate lands are located within the WSA boundary.

Naturalness

Man's influence for the most part is unnoticeable. Except for two short two-track trails that dead end, the area is free of intrusions. These intrusions blend into the overall view and are not noticeable from a distance. They do not impair the wilderness character of the WSA. The vegetation and/or topography screen the primitive trails, providing a high degree of naturalness.

Outstanding Opportunities for Solitude and/or a Primitive Unconfined Type of Recreation

The mountain and drainage, coupled with dense forest cover and riparian areas, provide a high degree of solitude, while creating numerous secluded places for recreational activities. With 70 percent of the area covered by trees, visitors are easily screened from one another. The Platte River Wilderness, which forms the eastern boundary of the WSA and contains 23,000 acres, enhances the opportunity for solitude in this WSA because of its undeveloped nature.

There are no developed recreational sites in or adjacent to the WSA. The road that forms a portion of the northern boundary of the WSA provides access to the North Platte River. This road, however, is accessible only via four-wheel drive vehicles.

The area offers opportunities for high-quality mule deer and elk hunting. It also offers hiking, camping, and rock hounding. The North Platte River offers high-quality fishing and floatboating. Opportunities for sightseeing within the WSA are numerous as the area is exceptionally scenic, has abundant wildlife such as raptors, small mammals and other nongame wildlife and is very photogenic.

Special Features

The Prospect Mountain WSA is highly scenic. Color and texture of the WSA contrast sharply with the adjacent high desert environment. Colors are many shades of green and blue in the warmer months and change to green, gold, and brown in the fall. The area has a Class II Visual Resource Management rating.

Recreational Resources

The Prospect Mountain area provides a variety of recreational activities, including fishing, hunting, sightseeing, hiking, camping, rock hounding, and wildlife viewing. The area is used by local residents and nonresidents alike. The North Platte River adjacent to the WSA offers high-quality fishing and floatboating, and is a well-known national attraction.

There are no developed recreational sites in or adjacent to the WSA.

Public access to the area is available by vehicle, horseback, hiking, or boat. Estimated use is 500 visitor days per year.

About 20 special recreation use permits have been issued to area guides and outfitters who use the WSA in conjunction with adjacent areas for hunting operations and floatboating.

Floatboaters access the WSA by way of the Prospect Creek access point on the North Platte River. This put-in and take-out point is reached via the road that forms a portion of the northern boundary of the WSA. Use varies according to water flow and weather conditions. Many river users camp along the river within the WSA or adjacent to it while on overnight float trips down the river. However, this road is eroding badly and is usable only with great difficulty. BLM is in the process of maintaining and upgrading the road.

Other major recreational use is associated with mule deer and elk hunting. This area provides high-quality hunting and has regional significance. There are approximately 1.3 miles of two-track roads.

Wildlife Resources

Up to 200 head of elk from the Snowy Range elk herd may be found in the Prospect Mountain WSA year round. The northern half of the WSA is part of a large crucial winter range that is considered essential to the survival of the herd. The aspen and conifer habitat types in the WSA provide elk with thermal and hiding cover. Forage is available in the aspen, riparian, and open sagebrush-grassland habitat types.

The WSA also provides yearlong habitat for up to 100 head of mule deer from the extensive Platte Valley herd. More deer use the WSA during winter,

when higher elevation habitat is made unavailable by deep snow. The extensive aspen and willow-riparian habitat sites on the WSA provide important fawning cover.

The aspen and willow-riparian habitat types on the WSA are used by up to 135 wildlife species. A list of species is available at the Rawlins District Office, but was not included in this EIS because of the large volume that would be of interest to a limited number of people. Aspen are found on both upland and riparian sites in the WSA. Aspen habitat is normally maintained by fire or other disturbances. In most areas of their occurrence within the WSA, stands are being rapidly invaded by conifers because of a lack of fire or other disturbance. About 30 percent of the WSA (320 acres) contains aspen in nonriparian areas.

Most of the riparian areas in the WSA are heavily utilized by livestock and wildlife and are not producing at their full potential. Riparian sites are highly productive in terms of plant and animal species diversity, vegetation structure, and biomass, and they are important to wildlife because of their limited availability. About 3 percent of the WSA (32 acres) contains riparian habitat.

Forest Resources

Prospect Mountain WSA contains about 450 acres of commercial forestland, primarily mature lodgepole pine. More than two-thirds of the forested land is suitable for timber harvesting without special logging techniques (see Map 8). The remaining acreage has limited harvesting opportunity because of poor accessibility, streamside protection corridors, and a visual buffer along the North Platte River.

The lodgepole pine is in several different even-aged stands that vary in age between 80 and 130 years. An understory of subalpine fir and Engelmann spruce is scattered throughout these stands. If left unmanaged the pine would eventually die because of insects and disease, and would be replaced by the subalpine fir and Engelmann spruce through natural succession.

The lodgepole pine is located on what is considered a good site (site index is 40 on a 50-year base) and has the potential, under intensive management, of producing 20,000 board feet per acre on a 100-year rotation. However, the current situation is a result of no past management. Current volumes range from 3,000 to 9,000 board feet per acre. The number of trees per acre varies from under 100 to over 1,000.

Mountain pine beetle activity is currently confined to about six small pockets of infestation. A risk rating system was applied to the sawtimber-sized lodgepole pine stands in the WSA to determine their susceptibility to major mountain pine beetle infestations. The risk rating system used incorporates climatic suitability (specifically latitude and elevation), tree age and tree size (Cole and Amman 1980). The results of this procedure indicate that a major outbreak is anticipated because of the elevation of the WSA (8,300 feet), an average diameter breast height of around 9 inches, and an average age of over 80 years. Mortality could reach one-half million board feet (over 5,000 trees) within the next 5 to 10 years.

The potential harvest from the WSA is about 60,000 board feet per year of conifer on a sustained yield basis under intensive management.

Demand for wood products exists from the sawmills located in Encampment and Saratoga. Over a period of 10 years or longer the potential wood supply from this WSA is insignificant toward meeting the needs of these mills. However, the wood that could be harvested becomes more important toward meeting their needs in a given year; particularly since this WSA has good winter logging potential, a feature that is highly desirable for this region.

Other forest product sales are relatively minor and include fuelwood cutting, corral pole cutting, and Christmas tree cutting. These types of sales result from individual requests from the public.

Mineral Resources

While there are mining claims in the WSA, Ryan (1988) states, "The occurrences of gold, silver, and copper at the sample sites are too restricted and low grade to constitute a resource. Oil and gas resources are precluded, according to previous investigations, by the presence of a very thick section of metamorphic rocks. There are no sand and gravel deposits within the WSA."

Cultural Resources

Two cultural surveys in 1979 and 1989 along the road bordering the WSA detected no cultural resources. No sites have been recorded in the WSA, nor have other inventories been undertaken. However, there is potential for prehistoric cultural resources along stream terraces and on the upland flats within the WSA. No historical cultural resources are known to exist.

BENNETT MOUNTAINS WSA

Introduction

There are environmental components found elsewhere that are not present in this WSA. Environmental components are not present in the WSA are areas of critical environmental concern (ACEC), coal resources, nonenergy leasable minerals, fisheries, floodplains, prime or unique farmlands, wetlands, wild horses, and wild or scenic rivers (designated or proposed), Native American Religious concerns, and solid and hazardous materials.

Restricting OHV use can potentially reduce soil erosion. However, in this WSA, OHV use is relatively light and is dispersed so that effects on soil erosion would be negligible.

Threatened or endangered species would be unaffected by the management alternatives for the WSA. The Bennett Mountains WSA is within the range of the bald eagle, peregrine falcon, and black-footed ferret which are protected by the Endangered Species Act of 1964 (as amended). However, no documented observations of these three species have been made in the WSA. Bald eagles may occasionally use the area during the winter for hunting. Peregrines are believed to migrate through the area in late fall and early spring. However, the WSA contains no breeding, nesting, or wintering habitat that would be essential to the recovery of either species. The area does not contain any prairie dogs, primary food of black-footed ferrets, so the existence of ferrets in the WSA is unlikely (see attached letter, Number 10, from the U.S. Fish and Wildlife Service).

General Description

The Bennett Mountains are located in north central Carbon County east of Seminoe Dam.

Vehicle access to the WSA during the warmer months is limited to unimproved two-track roads, trails, or ways. The only legal public vehicle access is by the Bennett Mountain/Dry Lake Road at the west end of the WSA. All other roads cross private land through which there is no legal access. Some visitors have crossed Seminoe Reservoir by boat and walked into the WSA in the summer, or crossed the ice by snowmobile in the winter. Other roads are the Hanna-Leo road which is approximately one mile east of the WSA, and the Kortes Dam road which is approximately one mile northwest of the WSA. Nonvehicle public access is available from both of these roads. During most of the winter, the WSA is inaccessible except by snowmobile.

The WSA ranges in elevation from approximately 6,600 to 8,000 feet. There are three basic types of topography in the WSA: (1) the mountain plateau/ridges, (2) the steep rock ledges and walls, and (3) the many tributary draws. The mountain, which is approximately four miles long, has distinct rocky ledges and walls along the entire southern exposure, and the northern portion is traversed with numerous tree-filled drainages. In many places, the rocky walls are vertical outcrops that create a fortress type appearance. In most cases, all portions of the WSA are interspersed with grasses, sagebrush and other shrubs, and pockets of pine, aspen, and willows. The higher elevations have considerably less vegetation and more rugged rocky features.

Wilderness Values

Size

The Bennett Mountains WSA contains 6,003 acres of public land. No private or state inholdings and no split-estate lands are located within the WSA boundary.

Naturalness

Man's influence is, for the most part, unnoticeable. The only intrusions are approximately four miles of two-track trails. These are not noticeable from a distance and do not impair the wilderness character of the WSA.

Outstanding Opportunities for Solitude and/or a Primitive, Unconfined Type of Recreation

The high plateau, coupled with numerous draws and rocky outcrops, provides a high degree of solitude. The mountain offers numerous secluded places for recreational activities. These features, along with pockets of overstory vegetation, offer screening for visitors throughout most of the WSA.

There are no developed recreational sites in or adjacent to the WSA. The Bennett Mountains WSA provides opportunities for primitive recreational activities that primarily include hunting, hiking, trapping, camping, wildlife viewing, and sightseeing.

Special Features

The mountain conveys a feeling of uncluttered open space, isolation, and peacefulness. This is accentuated by the altitude difference between the WSA and the surrounding low-lying plains. Its drainages and steep rock walls contrast sharply with adjoining landscapes. The topography and vegetation are quite different from the surrounding area to the north and south. The contrast between the WSA and surrounding plains is very abrupt as the plains below are relatively low and rolling.

The area has a Class II, Visual Resource Management rating. The Bennetts offer a spectacular view of Seminoe Reservoir, which adds significantly to the quality of the scenery, but also illustrates the effects of man's development.

Recreational Resources

The Bennett Mountains WSA provides opportunities for primitive recreational activities that include hunting, hiking, trapping, camping, wildlife viewing, and sightseeing. Use is primarily by Wyoming residents for all types of recreation, but nonresident hunters frequent the mountain during hunting season. All activities are dispersed.

Recreational use within the WSA was estimated to be approximately 1,000 visitor days in 1985. Most of the estimated visitor days are attributable to hunting or wildlife viewing activities. A limited amount of camping takes place during the hunting season. Use is concentrated primarily along the fringes of the WSA. Hiking and backpacking activities occur during the summer months but levels of use are low. Sightseeing and camping are largely associated with other recreational activities.

Hunting is the primary recreational activity. Mule deer are hunted throughout the area, and elk hunting occurs but is not significant. Visitor use is relatively constant from year to year with most use occurring in September and October.

Vehicle access points are available almost anywhere along the boundary of the WSA. However, all except one access point are accessible only by crossing private lands through which there currently is no legal public access. Until the early 1970s, public access across Seminoe Dam was permitted by the Bureau of Reclamation. After this route was closed, public use on the east side of Seminoe Reservoir and the south side of Bennett Mountains declined drastically. Access by boat across Seminoe Reservoir is available in the summer and by snowmobile when the lake is frozen in winter. The primary means of travel within the WSA are hiking and horseback riding for which access is available. OHV use occurs on the two-track trails within the WSA. There are approximately four miles of discontinuous two-track trails within the WSA.

Mineral Resources

Walker, Dixon and Fath (1983) stated:

"Comparison of the geology of the study area to that of the ranges to the east and west indicated that base and precious metal mineralization is possible within the Bennett Mountains Wilderness Study Area. The most likely occurrence would seem to be metalliferous veins emplaced during Laramide or younger plutonism. Because the purpose of this study is to determine the likelihood of mineral resources within the study area, other deposit types were considered and this appraisal is not restricted to vein-type mineralization.

"Based on an examination of the chemical data and the field evidence of the area, it is felt that metalliferous deposits are unlikely and that the metallic resource potential of the Bennett Mountains Wilderness Study Area is low.

"The Amsden, Goose Egg, and Chugwater Formations all occur within the southern boundary of the study area. Each contains shaly members, but it is felt that the limestone and sandstone interbeds plus the abundant iron oxides render them unsuitable for ceramic or related manufacturing. A further consideration is the remoteness of the study area and the cost of transportation which must be included in resource potential evaluation. While no tests were performed on these units to determine if they do have resource potential for the ceramic industry, the cost of transportation would seem to invalidate any such potential. Thus the resource potential of the shales and clays of the Bennett Mountains Wilderness Study Area is considered to be low.

"Significant resources of stone exist within the boundaries of the Wilderness Study Area. The Flathead-Deadwood Sandstone which crops out in the southern portion of the study area has been used for dimension and building stone in other parts of Wyoming. The Madison and Alcova Limestones have been quarried for use as building stone and flux and have potential as a source of cement. The Precambrian crystalline rocks as well as the Phanerozoic sand-

stones and limestones would make excellent road material and aggregate. Transportation costs effectively render the Flathead-Deadwood, Madison, and Alcova units of the Bennett Mountains Wilderness Study Area noneconomic with regard to stone and aggregate resources. Thus, while reserves of stone and aggregate are present within the study are, there is low potential.

"A low resource potential for gypsum is estimated for the study area, in part because more favorably located deposits of gypsum in commercial quantities are found in other locations in Wyoming.

"As indicated earlier, the Tensleep Sandstone and the Madison Limestone are notable petroleum producers in other parts of Wyoming. Within the study area these units are nearly vertical and thus are ineffective as anticlinal traps. The possibility that faulting along the southern margin of the Bennett Mountains may have created fault traps for oil and natural gas must be considered. If in fact such traps exist, their producing potential would be very low with respect to the study area. The volume of Tensleep Sandstone and Madison Limestone occurring within the Bennett Mountains Wilderness Study Area is small compared to that required for a viable oilfield. Because of these limitations, the oil and natural gas potential of the study area must be considered low.

"No evidence of coal or peat accumulation was noted within or adjacent to the Bennett Mountain Wilderness Study Area during this investigation, though coal is produced from units higher in the stratigraph section than occur within the study area."

Cultural Resources

In 1989, BLM surveyed a spring development immediately outside the southern boundary of the WSA and recorded one prehistoric site. It was judged ineligible for the National Register of Historic Places. The potential for prehistoric cultural resources is good near springs (one spring at the northern margin of the WSA is named Indian Springs) and along terraces of live stream.

No historical cultural sites have been recorded.

CHAPTER 4

ENVIRONMENTAL CONSEQUENCES

ENCAMPMENT RIVER CANYON

No Wilderness Alternative

Effects on Wilderness Values

Under the Proposed Action, none of the the wilderness values in the WSA's 4,537 acres would be given the long-term, special legislative protection afforded to designated wilderness.

Effects on Naturalness

Prescribed burning would destroy naturalness on approximately 600 acres directly and have a visual effect on approximately 1,200 acres for a period of from 1-3 years after which it would return to near pristine conditions.

OHV use would result in trails, dust, physical presence,a nd sounds along the three miles of two-track (approximately 500 acres) when they are present (from May 1 to November 30). However, OHV use is prohibited year round on the Encampment River Trail. Therefore, OHV would not effect naturalness in that area (approximately 4,000 acres). Range improvement projects (2 springs and 5 miles of fence) would destroy the visual aspects of naturalness in the immediate vicinity of the project (2-3 acres).

Effects on Outstanding Opportunities for Solitude

The depth of the canyon and the noise of the river screen out upland vehicular sights and sounds from the river trail. Most of the visitor use is along the Trail, where OHV use is prohibited and visitor use is at a level (1,000 visitor days/year) where contacts among visitors are not frequent. Therefore, opportunities for solitude would not be lost on the most popular portion of the WSA. Range improvement projects (2 spring developments and 5 miles of fence) would interfere with solitude up to two months during construction. Prescribed burning on 600 acres would interfere with solitude up to 2 weeks during the actual burn. The effect would be minimal because few visitors are present during the spring season when the burning would take place.

Effects on Outstanding Opportunities for Primitive, Unconfined Recreation

Cattle use of the area would continue to draw flies into the area and irritate recreationists. Also there would be some conflicts between the animals and the people engaged in primitive recreation activities. Prescribed burning of 600 acres in the spring would interfere with primitive recreation for a period of two to four weeks after burning. The effect would be insignificant because few visitors are present during the spring.

Effects on Special Features

Because there would be no surface disturbing activities that affect the features, there would be no negative effects on special features, such as placer gold which attracts recreational gold panning, mining relics left from the historical exploration and mining activities.

Conclusion: OHV use would interfere with wilderness values of naturalness, solitude, and primitive, unconfined recreation from May 1 to November 30 on approximately 500 acres. Spring developments and fence construction would result in some loss of wilderness values (mainly naturalness and unconfined recreation) on up to three acres. Spring burning would affect solitude and primitive, unconfined recreation for the time of the burn and would effect naturalness for up to three years. Special features would not be affected by proposed management actions.

Effects on Recreational Opportunities

Under this alternative, all forms of recreation would remain unchanged. Activities would include those of a primitive nature such as hunting, fishing, hiking, camping, and sightseeing. Visitor use of the Trail is projected to increase to 1,000 visitor days in 5 years (about a 30% increase) and then level off. The increase would have an effect on primitive recreation because there would be an anticipated 30% increase in human contact.

OHV use of an estimated 500 visitor days would continue. Use would continue to be limited to existing roads and trails that have seasonal closures.

As a result of spring burning of 600 acres of shrub lands (vegetative manipulation) bighorn sheep will use the area more often and for a longer period of

time, thus increasing the opportunity (up to 25%) for the visitor to view the animals. As the habitat improves, sheep populations are expected to increase from current populations of less than 50 head to an objective level of 150 head. Perhaps hunting of bighorn sheep will be permitted at a later date. Spring burning of shrub lands would also enhance viewing opportunities for elk and mule deer in the WSA during winter periods. The vegetation manipulation projects would maintain current hunting levels of approximately 200 visitor days for elk and mule deer.

Projected range improvement projects would not affect recreational opportunities in the WSA because the two spring developments and the five miles of fence construction are small and are screened by topography and vegetation. They would, however, reduce visitor conflicts with cattle by attracting cattle away from the trail which recreationists use. However, cattle-human encounters are expected to continue along the trail. The effects of these conflicts are subjective and may be intolerable to some individuals, while not to others.

Conclusion: Existing recreational activities would remain unchanged. The recreation experience would be enhanced with an estimated 25% increase in bighorn sheep viewing. Encounters with cattle on the trail would continue.

Effects on Big Game Management

In this WSA bighorn sheep, elk, and mule deer are the primary species of concern. The winter OHV closure would prevent harassment of wildlife from snowmobile use on crucial big game winter ranges, and from recreational OHVs during the bighorn sheep parturition period. Therefore, there would be no stress and no displacement of big game from OHV use during those seasons. While this would not lead to a population increase, it might reduce winter mortality by about 10%. The continued closure of the River Trail to OHV use year-round will prevent disturbance of wildlife in that area from OHV use.

Burning of 600 acres of mountain shrub/aspen habitats would improve the quality of crucial winter habitat for bighorn sheep, elk, and mule deer. The quality and quantity of big game forage would increase two to five times. Bighorn sheep populations would be expected to triple, but deer and elk numbers would remain the same. The highest quality forage would enhance the viability of the Encampment bighorn sheep herd and the elk and mule deer that use the area because less energy would be used to obtain sufficient food. The wildlife guzzlers would reduce the need for bighorn sheep ewes and lambs to travel long distances to water, thus reducing energy requirements and increasing forage efficiency. While these action might cause a slight increase in elk and mule deer (less than 5 percent), mortality of bighorn sheep lambs should lessen (perhaps up to 25%) with an increase in forage quality. The result would be that the existing population of bighorn in the area is expected to or increase to 150 head.

Projected range improvement projects although not expected to improve wildlife values would be designed to avoid loss of wildlife values. Therefore, there would be no effect.

Conclusion: Management actions would result in an increase of about 100 bighorn sheep and maintain elk and deer populations while improving overall habitat quality.

Effects on Livestock Management

There would be no change in AUMs. Projected (5 miles) allotment boundary fences would improve distribution patterns and eliminate uncontrolled drift of cattle among allotments. Two new spring developments would improve distribution and provide additional sources of water for cattle. Consideration of scenic, wildlife and recreation values in the design and construction of range improvement projects would cause greater implementation expense as compared to standard construction. This consideration would include use of let-down fences and location of projects to avoid visual intrusions and losses of wildlife. These additional costs could preclude the construction of range improvements.

Proposed vegetation manipulation to improve big game crucial winter range would not improve forage availability for livestock to any great extent because of differences in food habits. Cattle do not utilize the shrubby plants nor steep slopes as do big game. Routine management activities such as herding, checking cattle, or placing salt blocks would continue to be allowed.

Conclusion: There would be no negative impacts on livestock management from the actions initiated in this alternative.

Relationship Between Short-term Use of the Environment and the Maintenance and Enhancement of Long-term Productivity

If a WSA is not designated wilderness, all present, short-term uses would continue. Off-road vehicle use, timber harvest, and mineral exploration activities would result in the loss of wilderness values over the long term.

If an area is designated wilderness, it would ensure the long-term productivity of ecosystems and would maintain or enhance present wilderness values. Motorized vehicles could no longer be used except where prescribed by an area's wilderness management plan. Mineral resources would not be available for exploration or development after the date of designation, subject to a validity examination.

Irreversible and Irretrievable Commitment of Resources

No activities are projected under any alternative that would result in an irreversible and irretrievable commitment of resources. Activities such as mineral exploration, mining, and material sales could create an irreversible commitment of the wilderness resource in part or all of a WSA, if not designated as wilderness but none are anticipated. Wilderness designation would not create an irretrievable or irreversible commitment of resources within a WSA. Designation would restrict or stop development activities and maintain an area's natural condition. If, in the future, Congress decided it would be in the national interest to develop certain resources within a wilderness, they can modify the law to allow it.

Unavoidable Adverse Impacts

No activities are projected under any alternative would result in unavoidable adverse impacts.

Proposed Action (All Wilderness)

Effects on Wilderness Values

Under this alternative, wilderness values in the entire 4,547 acres of the Encampment River Canyon WSA would be given the special legislative protection afforded to designated wilderness.

Effects on Naturalness

Closing the area to OHVs yearlong would produce a positive effect on naturalness because of visual effects and reduction of possible soil erosion. Burning of 600 acres of mountain shrub/aspen for big game habitat improvements would cause a temporary impact on naturalness. Within five years the effect of burning would not be noticeable. Range improvement projects (2 spring developments and 5 miles of fence) built to non-impairment standards would have virtually no impact on naturalness. These improvements would be screened them from view and designed to blend in with the natural setting. The use of "let-down" fences would aid in making the effects minor.

Effects on Outstanding Opportunities for Solitude

Closing the area to OHV use would produce a positive effect because there would be no visual or auditory intrusions. Burning of 600 acres of mountain shrub/aspen for big game habitat improvement would have virtually no effect because it would occur in the spring when there is little or no visitation. Development of two springs and five miles of fence would have a negative effect during construction because of the sight and sound associated with construction.

Effects on Outstanding Opportunities for Primitive Unconfined Recreation

Closing the area to OHV use would result in a reduction in visual and auditory intrusions. Burning of 600 acres of mountain shrub/aspen for big game habitat improvement would have virtually no effect because it would occur in the spring when there is little or no visitation. The development of two springs and the construction of five miles of fence would effect opportunities for primitive, unconfined recreation during the construction period (up to two months) because of sight and sound associated with construction.

Effects on Special Features

Recreational gold panning, relics left from the historical exploration and mining activities, and the proposed National Natural Landmark would be assured protection under wilderness designation.

Conclusion: Under this alternative the wilderness values of naturalness, opportunities for solitude, and opportunities for primitive and unconfined recreation would be substantially protected on about 4,000 acres in the Encampment River Canyon WSA. The remaining acreage would be temporarily damaged from prescribed burning and range improvement construction. The scenic quality of the area would be preserved.

Effects on Recreational Opportunities

Recreational use of the Encampment River Trail would be largely unaffected. Those uses include

such things as hunting, fishing, hiking, camping, and sightseeing. Trail use is projected to level off at about 1,000 visitor days within the next five years.

Under this alternative, motorized forms of recreation would be eliminated. This would displace approximately half of the use that currently occurs away from the Encampment River Trail, about 500 visitor days annually of OHV use. The other half of the use away from the trail consists of hunting, hiking, and sightseeing which are mostly done on foot, so there would be an insignificant change (less than 1%).

The OHV use displaced from the WSA could easily be shifted to other areas of public land with virtually no effect on opportunities for motorized recreation in the region.

Since there are few range improvements proposed, conflicts between cattle and recreationists from concentrated use along the trail would remain. Some potential campsites would still have reduced vegetation and concentrations of cattle manure because cattle would continue to use them for loafing areas.

Conclusion: Recreational opportunities of the Encampment River Trail would be largely unaffected, but use away from the trail would be reduced about 50% because of the displacement of 500 visitor days associated with OHV use eliminated from the WSA.

Effects on Big Game Management

The OHV closure would have virtually no effect because current seasonal restriction on OHV use prevent disturbance during critical times of the year when the animals are present.

The quality of big game habitat and it's ability to support animals would be improved the same as the proposed action. There would be no use of vehicles for fire suppression because of the wilderness designation making fire control somewhat more difficult. Sheep populations are expected to increase from less than 50 head to approximately 150 head because of increases in forage as a result of prescribed burning the same as under no wilderness.

Projected range improvement projects would be designed to consider wildlife values. "Let-down" fences would be used during critical winter periods so that the effect would be as if no fence existed. However, in the summer, the fences would be there to control cattle. The two spring developments would also be used by wildlife.

Conclusion: The quality of big game habitat and its ability to support animals would be enhanced through spring burning. Bighorn sheep numbers would increase from 50 head to 100 head.

Effects on Livestock Management

The WSA would continue to provide about 400 AUMs of forage.

Routine management activities such as herding, checking cattle, or placing salt blocks would need to be done on foot or horseback. The result would be more labor intensive (up to 5% more expensive) because of motor vehicle restrictions in a wilderness area.

Projected allotment boundary fences would improve distribution patterns and eliminate uncontrolled drift of cattle among allotments. New spring developments would improve distribution and provide additional sources of water for cattle. Compliance with the wilderness management policy would result in higher construction expenses (up to 50% higher) as compared to standard construction. The increased construction costs would be the result of using let-down fences, locating projects to avoid visual intrusions and restricting the use of motorized equipment.

Conclusion: Compliance with BLM's Wilderness Management Policy would have an affect on livestock grazing primarily because of the restriction on the use of motor vehicles. It would be more costly in time and money to manage livestock solely by horseback or foot (up to 5%).

PROSPECT MOUNTAIN WSA

Proposed Action (All Wilderness)

Effects on Wilderness Values

Under this alternative all of the 1,145 acres in the Prospect Mountain WSA would be designated wilderness.

Effects on Naturalness

As a result of wilderness designation, impairing activities would be precluded. Therefore, the area would be assured protection in its current state of naturalness in the long term. Prescribed burning of 120 acres to improve big game habitat would be noticeable for two to five years. In addition, OHV closure would allow approximately one and one-half miles of two-track to return to a natural condition.

No forest management activities would be allowed that would affect naturalness.

Effects on Outstanding Opportunities for Solitude

Solitude would be preserved. Prescribed burning would occur when visitors are not present so there would be no effect on solitude on the 125 acres. OHV closure will result in preservation of solitude. No forest management activities would be allowed that would impair solitude.

Effects on Outstanding Opportunities for Primitive, Unconfined Recreation

Primitive, unconfined recreation would be preserved. Prescribed burning would occur when visitors are not present so the effect on primitive, unconfined recreation on the 125 acres would be indirect and would result in an avoidance of that area for about one year. No forest management activities would be allowed that would impair primitive, unconfined recreation. OHV closure would improve the quality of primitive, unconfined recreation by about 10%.

Effects on Special Features

The scenic features of the area would be changed only in the short-term from the prescribed burning of 120 acres, which visually affects an additional 100 acres. The effects of burning would be noticeable for two to five years but would not be different from that expected from naturally occurring fire set by lightning since the mosaic pattern of the burn would be similar.

Conclusion: Under this alternative the wilderness values of naturalness, opportunities for solitude, and opportunities for primitive and unconfined recreation would be assured in the Prospect Mountain WSA. Closing the area to OHV use would enhance opportunities for solitude and primitive recreation and allow one and one-half miles of two track to return to a natural condition.

Effects on Recreational Opportunities

All OHV use (approximately 500 visits/year) would be displaced by the closure. However, because the area is small and there is little use, there would be few problems associated with the displacement of visitor use. There are other OHV areas outside the WSA which can accommodate that amount of additional use. Most visitor use is for hunting and the area can easily be covered on foot. The impacts would be insignificant. Primitive recreational values and opportunities would be protected and enhanced.

Conclusion: OHV closure would displace approximately 500 recreational visits to the area each year.

Effects on Big Game Management

Closing the area to OHV use would benefit big game by reducing big game encounters with recreationists and the associated stress and displacement. This effect would be minor since OHV use in the area is low (about 500 visits/year).

Burning of about 120 acres would improve the quantity and quality of crucial elk winter range where up to 100 elk spend part of the winter. Annual production of grasses and shrubs is expected to increase 2 to 5 fold over current production. Elk numbers are not expected to increase since this area in only a small part of the total winter range.

Conclusion: Closing the area to OHV use would have little effect on stress and displacement of big game. The quality of elk habitat would be improved on 120 acres as a result of burning; however, no change in population is anticipated.

Effects on Forest Management

There would be no forest management activities under this alternative. Natural forest succession would continue with eventual conversion of the lodgepole pine stands to Engelmann spruce and subalpine fir. Chance fire occurrence would be the only disturbance that would revert stands back to young lodgepole pine and aspen.

Increased mountain pine beetle activity would accelerate the decline of the lodgepole stands and consequently speed up the development of Engelmann spruce and subalpine fir stands. Lodgepole mortality caused by mountain pine beetle would increase the fire hazard because of increased accumulations of dead wood, and could lead to large wildfires in the long term.

Productivity of the forest in terms of useable wood fiber growth would remain far below its potential. Incidence of tree mortality due to naturally occurring insects and disease would remain high. The productivity and health of the forest would be far less than optimal from the standpoint of wood fiber growth.

The gradual establishment of Engelmann spruce and subalpine fir would result in an increase in tree

diversity in terms of different species, sizes, and ages within any given stand.

Wood products from the WSA would be unavailable to the sawmills located in Encampment and Saratoga. A one million-board-foot timber sale needed in the near future to control current mountain pine beetle activity would be forgone. The elimination of this planned sale would result in a loss of about 10 work-years of potential employment and about $760,000 in potential revenue generation based on current market value. Prohibiting timber harvest in the WSA would also mean that an area with winter logging potential would be unavailable. This factor is locally important in the short-term because the Platte Valley has limited opportunities for winter harvesting.

Over the next 60 years, the amount of harvest forgone would be 2.5 million board feet. This would amount to about 2 percent of the total volume of BLM timber to be harvested in the Rawlins District within this timeframe. This volume would amount to less than 0.1 percent of the total volume of timber that will be harvested by the Forest Service and the BLM in south-central Wyoming within this 60 year time period. Therefore, in the long term, the loss of this timber would not be very important to the local economy.

Conclusion: Natural forest succession would continue with eventual conversion of the lodgepole pine stands to Engelmann spruce and subalpine fir. Fire hazard would increase. The productivity and health of the forest would be far less than optimal. Tree diversity, in terms of different species, sizes, and ages within any given stand would increase. The loss of 2.5 million board feet of lumber produced from harvesting 300 acres is not a significant impact in the long term.

Relationship Between Short-term Use of the Environment and the Maintenance and Enhancement of Long-term Productivity

If an area is designated wilderness, it would ensure the long-term productivity of ecosystems and would maintain or enhance present wilderness values. Motorized vehicles could no longer be used except where prescribed by an area's wilderness management plan.

If a WSA is not designated wilderness, all present, short-term uses would continue. Off-road vehicle use and timber harvesting activities would result in the loss of wilderness values over the long term.

Irreversible and Irretrievable Commitment of Resources

Activities such as OHV use and timber harvesting could create an irreversible commitment of the wilderness resource in part or all of a WSA, if not designated as wilderness. Wilderness designation would not create an irretrievable or irreversible commitment of resources within a WSA. Designation would restrict or stop development activities and maintain an area's natural condition. If, in the future, Congress decided it would be in the national interest to develop certain resources within a wilderness, they can modify the law to allow it.

Unavoidable Adverse Impacts

If the area is designated wilderness, there would be no timber harvesting. No timber harvesting would result in a loss of about 10 work years of employment and $737,000 in revenue to the local economy.

No Wilderness Alternative

Effects on Wilderness Values

Under this alternative 1,145 acres in the Prospect Mountain WSA would not be designated wilderness.

Effects on Naturalness

OHV use along approximately one and on-half miles of two-track routes would have a negative effect on naturalness, but would be minor because of the low frequency of OHV use (about 500 visits/year) in the area. Prescribed burning of 120 acres of mountain shrub/aspen to improve big game habitat would be noticeable for two to five years, but would not be different from that expected from a naturally occurring fire set by lightning.

Forest management activities would impair naturalness. The clearcuts (50 acres every 10 years) and the construction of four miles of roads (2.5 acres) would degrade naturalness for many years.

Effects on Outstanding Opportunities for Solitude

OHV use would have a negative impact on solitude. Prescribed burning would occur when visitors are not present so the effect would be indirect.

Forest management activities would impair solitude during harvest.

Effects on Outstanding Opportunities for Primitive, Unconfined Recreation

The sights and sounds associated with OHV use would have a negative effect on primitive, unconfined recreation. Prescribed burning would occur when visitors are not present so the effect would be for a period of up to one year as visitors avoid the area. Forest management activities would have long-term, negative effects on primitive recreation because of the physical scars that are left, the sights and sounds associated with harvesting, and the visual effects on uneven, aged timber stands.

Effects on Special Features

OHV use, prescribed burning, and forest management activities would reduce the quality of the scenic beauty on the majority (up to 800 acres) of the area because of the visual impact of the disturbed acreage.

Conclusion: Continued OHV use would degrade opportunities for solitude and primitive recreation on the majority of the area during the infrequent times they are present. Forest management activities would substantially degrade the wilderness values of naturalness, scenery, and opportunities for solitude and primitive unconfined recreation on up to 80% of the area.

Effects on Recreational Opportunities

Recreational use is not likely to change in the Prospect Mountain area because of its remote location and small size, and would remain at about 500 visits/year.

Timber harvesting could displace recreationists during development or management activities. However, these forest management activities would be limited to specific areas for approximately two months in the summer every ten years (Map 5) and would have little impact. Logging roads would be used by recreationists until reclaimed.

Conclusion: Recreational use and values would continue at approximately 500 visits/year. Forest management could displace recreationists for a period of two months once every ten years.

Effects on Big Game Management

Prescribed burning or cutting on 120 acres would enhance perennial grass production and stimulate important shrub communities. These actions would improve crucial elk winter range and the high priority habitat of mountain shrub in the area, but because the area is so small, there would be an insignificant impact on elk numbers.

Under this alternative, logging within the boundaries of the crucial elk winter range would occur during noncritical periods. Timber removed, as described in the alternatives, would neither benefit or adversely impact the crucial range. Disturbance of wintering and calving elk would be avoided by seasonal stipulations (see Appendix). There would be no significant effect on wildlife habitat and populations from forestry under this alternative.

Conclusion: Continued OHV use would not significantly affect big game. Prescribed burning would improve 120 acres of crucial elk winter range and high priority habitat types. Forest management would have no significant effect on wildlife habitat and populations.

Effects on Forest Management

Forest management activities would occur under this alternative. These activities would include timber harvesting, along with associated road building, thinning, and fuelwood sales. Of the 450 acres of commercial forestland in the WSA, approximately 300 would receive intensive forest management.

Harvesting of lodgepole pine that is being attacked by mountain pine beetles would reduce fire hazard that would otherwise result from a buildup of dead wood.

Productivity of the forest in terms of useable wood fiber growth would be enhanced by timely removal of mature timber and the establishment of healthy regeneration. Incidence of tree mortality due to insect and disease activity would be reduced by forest management activities.

Forest diversity within harvested areas would be reduced. Clearcuts would be regenerated with lodgepole pine that would be all the same age. In the unharvested areas the gradual establishment of Engelmann spruce and subalpine fir would lead to an increase in tree diversity, in terms of different species, sizes, and ages within any given stand.

Wood products from the WSA would be available to the sawmills located in Encampment and Sarat-

oga. A one million-board-foot timber sale that is needed in the near future to control current mountain pine beetle activity would contribute to the local economy for 1 or 2 years. This sale would provide about 10 work years of employment and generate about $737,000 of revenue in the local economy. The forest stands in the WSA are suitable for winter logging, and this availability is locally important because the Platte Valley has limited opportunities for winter harvesting.

Over the next 60 years the amount of harvest from the WSA would be 2.5 million board feet. This amount is about 0.1% of the total timber harvest in the Platte Valley, and is not considered a significant impact in the long term.

Conclusion: Timber harvesting would reduce fire hazard and diversity of species. A 1million-board-foot timber sale in the near future would occur and ultimately, 2.5 million board feet would be harvested. There would be a positive effect on forest management.

BENNETT MOUNTAINS WSA

Proposed Action (No Wilderness)

Effects on Wilderness Values

None of the 6,003 acres in the Bennett Mountains WSA would be designated wilderness.

Effects on Naturalness

Since there is low OHV use (less than 100 visitor days/year) on the four miles of two-track road and no management actions planned for the area, there would be little effect on the naturalness of the area.

Effects on Outstanding Opportunities for Solitude

Continued use of approximately four miles of two-track roads would reduce the solitude during the hunting season. No management actions are proposed for this area. Therefore, there would be no effect from management on solitude.

Effects on Outstanding Opportunities for Primitive, Unconfined Recreation

Continued use of approximately four miles of two-track roads would reduce the quality of primitive unconfined recreation. No management actions are proposed for the WSA so there would be no effects from management on primitive, unconfined recreation.

Effects on Special Features

Two hundred (200) acres would be affected visually by the four miles of two-track routes. There would be no adverse effect to scenery on about 5,800 acres of the WSA.

Conclusion: There would be a negative effect on wilderness values on approximately 200 acres from continued OHV use.

Effects on Recreational Opportunities

Under this alternative, recreation in the Bennett Mountains would remain largely unchanged in the long term because there are no management actions planned. The overall level of recreation use, primarily hunting, would remain at about 500 visits/year.

Conclusion: Recreational use and values would be little changed.

Relationship Between Short-term Use of the Environment and the Maintenance and Enhancement of Long-term Productivity

If a WSA is not designated wilderness, all present, short-term uses would continue. Off-road vehicle use and mineral exploration activities would result in the loss of wilderness values over the long term.

If an area is designated wilderness, it would ensure the long-term productivity of ecosystems and would maintain or enhance present wilderness values. Motorized vehicles could no longer be used except where prescribed by an area's wilderness management plan.

Irreversible and Irretrievable Commitment of Resources

No actions are anticipated which would result in an irreversible and irretrievable commitment of resources. Wilderness designation would not create

an irretrievable or irreversible commitment of resources within a WSA. Designation would restrict or stop development activities and maintain an area's natural condition. If, in the future, Congress decided it would be in the national interest to develop certain resources within a wilderness, they can modify the law to allow it.

Unavoidable Adverse Impacts

No actions are anticipated that would result in unavoidable adverse impacts.

All Wilderness Alternative

Effects on Wilderness Values

All of the 6,003 acres in the Bennett Mountains WSA would be designated wilderness.

Effects on Naturalness

OHV use on about four miles of two-track routes would be eliminated and the routes would return to a natural state within 20 years. Naturalness would be preserved because of the elimination of OHVs.

Effects on Outstanding Opportunities for Solitude

OHV use would not be allowed; solitude would be preserved.

Effects on Outstanding Opportunities for Primitive, Unconfined Recreation

OHV use would not be allowed; primitive recreation would be preserved.

Effects on Special Features

The two track roads would gradually disappear as plant succession returns the area to a natural setting. Scenery in the area would be preserved because no management actions are planned.

Conclusion: Under this alternative, the wilderness values of naturalness, opportunities for solitude, and opportunities for primitive and unconfined recreation would be assured in the Bennett Mountains WSA. Closing the area to OHV use would ensure opportunities for solitude and primitive recreation would be maintained. The scenic quality of the area would be preserved.

Effects on Recreational Opportunities

Recreational use (hunting, hiking, sightseeing, etc.) would remain largely unchanged except no vehicle use would be permitted. Wilderness designation would allow this area to be utilized for nonmotorized activities that are historically important and increasingly popular in this area. Recreational activities currently associated with OHV use, such as hunting or sightseeing, would continue without the use of motor vehicles, but would be reduced initially from about 500 to about 250 visitor days. Visitor days would probably return to 500 visitor days within ten years of designation because of the projected increase in outdoor recreational activities. The WSA is small enough that recreationists could easily walk from boundary access points into the area for these activities.

Closing four miles of two-track routes in the WSA would result in a displacement of about 250 visits/year of motorized recreation. This use would be accommodated in nearby areas.

Conclusion: Closing four miles of discontinuous two-track routes in the WSA would have an insignificant, long-term effect on opportunities for recreation in the region.

CHAPTER 5

CONSULTATION AND COORDINATION

COORDINATION AND PUBLIC INVOLVEMENT

Introduction

The Preliminary Final Wilderness Environmental Impact Statement for the Great Divide Resource Area has been prepared by specialists from the BLM's Great Divide Resource Area, with assistance from the Rawlins District Office.

Public participation has been an ongoing process throughout the inventory and planning phases of the wilderness review required by FLPMA. The review process included inventories of resources, public participation, and coordination with individuals, organizations, and other agencies. Care has been exercised to inform the public throughout the wilderness review process.

A *Federal Register* notice and news release in February 1986 announced the initiation of the Medicine Bow RMP and wilderness EIS, inviting comments and soliciting suggestions and input on issues identified to be analyzed in the land use planning effort including wilderness.

Wilderness has been a topic in formal and informal meetings involving many members of the ranching community and minerals industries and with other interest groups and agencies. Public opinion was elicited through mailings to an extensive list of groups and individuals; personal interviews; and public meetings in Rawlins, Saratoga, Laramie, Medicine Bow, Baggs, and Wheatland. A summary of the comments generated from those meetings is on file in the Great Divide Resource Area and the Rawlins District Office.

Consistency

Federal, state and local agencies, and organizations were considered during the preparation of this EIS. Wilderness suitability recommendations resulting from this EIS were analyzed in relationship to consistency with the plans of these agencies and organizations. No inconsistencies with any existing state or other government plans were identified. Frequent contacts have been made with state, county, and Forest Service officials.

Agencies and Organizations Consulted

The wilderness EIS team has consulted with and or received input from numerous organizations during the development of this document. The Rawlins District Office maintains a lengthy wilderness mailing list. At each point in the overall wilderness review/EIS process, when public input is necessary or when some tentative decision regarding a WSA is reached, materials and/or information are sent to all groups, organizations and individuals on the mailing list.

The following list is representative of the agencies that have indicated an interest in the Great Divide Resource Area Wilderness EIS and that have been contacted during the planning process. This list is not inclusive. A complete list is on file at the Great Divide Resource Area office.

Required Reviewers

Federal Agencies

U.S. Department of the Interior
- Bureau of Indian Affairs
- Bureau of Land Management (340), Washington, D.C.
- Bureau of Land Management (931), Cheyenne, WY
- Office of Environmental Project Review, Denver, CO
- National Park Service, Division. of Env. Compliance (WASO 762), Washington, D.C.
- U.S. Fish and Wildlife Service, Chief, Division Environmental Coord., Washington, D.C.
- Minerals Management Service Offshore Environmental Assessment Division, Washington, D.C.
- Bureau of Reclamation, Division of Environmental Affairs, Washington, D.C.
- Bureau of Mines, Mineral Data Analysis (MS-5000), Washington, D.C.
- U.S. Geological Survey, National Center (423), Reston, VA
- Office of Surface Mining, Division of Environmental & Economic Analysis, Washington, D.C.

U.S. Department of Agriculture
- Forest Service, Office of Environmental Coordination, Washington, D.C.

U.S. Air Force
- HQ USAF/LEER, Washington, D.C.
- HQ-US LEVX, Office of Environmental Planning, Bolling AFB, Washington, D.C.
- Assistant Secretary of the Air Force, Installation Environment and Safety, Pentagon, Admiralty, VA

U.S. Army Corps of Engineers
- Chief, Planning Division, Omaha, NE
- Chief, Planning Division, Portland, OR

Federal Agencies (continued)

Department of Energy (EP-36), Washington, D.C.

Nuclear Regulatory Commission, Bethesda, MD

Federal Energy Regulation Commission, Washington, D.C.

Environmental Protection Agency, Denver, CO
- Environmental Review Coordinator, EPA Region VIII, Denver, CO

State Agencies

Wyoming Office of the Governor, Cheyenne, WY
- Wyoming State Planning Commission, Cheyenne, WY
- Archives, Museums, and Historical Department
- State Board of Land Commissioners
- University of Wyoming
- Conservation Commission
- Department of Agriculture
- Department of Environmental Quality
- Game and Fish Department
- Geological Survey
- Highway Department
- Recreation Commission
- State Engineer
- Water Development Commission
- Oil and Gas Conservation Commission
- Public Lands Commission
- State Historic Preservation Officer
- State Planning Coordinator's Office

Tribal Business Councils

Arapahoe Business Council
Shoshone Business Council

Other Contacts

Federal Government

U.S. Department of Agriculture
- Farmers Home Administration
- Soil Conservation Service
- U.S. Department of Transportation

State of Wyoming

National Guard
Public Lands and Farm Loan District

Counties and Cities

Cities and towns of Bairoil, Cheyenne, Encampment, Hanna, Laramie, Medicine Bow, Rawlins, Saratoga, and Wheatland

County commissioners, county planning commissions, and weed and pest control districts of Albany, Carbon, Laramie, and Sweetwater counties.

Congressional Offices

Office of Senator Malcolm Wallop
Office of Senator Alan K. Simpson
Office of Congressmen Richard Cheney

State Elected Officials

Wyoming Governor's Office
- State senators and state representatives from Albany, Carbon, Laramie, and Sweetwater counties.

In addition to the agencies and offices listed above, notices, requests for comments and copies of this document have been sent to businesses, organizations, interest groups, and individuals. Copies of the wilderness EIS are available for review in the BLM offices at Rawlins, Lander, Worland, Rock Springs, Cheyenne, and Casper and in the county libraries in Albany, Carbon, Laramie, and Sweetwater counties.

List of Preparers

EIS Team

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Qualifications: Bureau of Land Management, 8 years. B.S. Forest Management, University of Illinois.

Responsibility: Forestry

Shirley Bye-Jech, Outdoor Recreation Planner

Qualifications: Bureau of Land Management, 7 years,. B.S. Outdoor Recreation Planning, Oregon State University.

Responsibility: Technical Coordination

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John Husband, RMP/EIS Team Leader

Qualifications: Bureau of Land Management, 10 years. B.S. Forestry, Purdue University.

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Robert Janssen, Planning and Environmental Specialist

Qualifications: Bureau of Land Management, 11 years. B.S. Earth Sciences, University of Wisconsin; M.S. Geology, Colorado State University.

Responsibility: Minerals

Vern Lovejoy, Outdoor Recreation Planner

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Responsibility: Word Processing

Mark Newman, Geologist

Qualifications: Bureau of Land Management, 9 years; private industry, 4 years. B.S. Geology, University of Wisconsin.

Responsibility: Minerals

Tom Rinkes, Wildlife Biologist

Qualifications: Bureau of Land Management, 10 years. B.S. Wildlife Resources, University of Idaho.

Responsibility: Wildlife

John Spehar, Range Conservationist

Qualifications: Bureau of Land Management, 9 years. B.S. Forestry, University of California at Berkeley.

Responsibility: Livestock Grazing

Fred Stabler, Fisheries Biologist

Qualifications: Bureau of Land Management, 9 years; U.S. Fish and Wildlife Service, 1 year. B.S. Wildlife Biology, Washington State University; M.S. Fishery Resources, University of Idaho.

Responsibility: Fisheries

Steve Strenger, Soil Scientist

Qualifications: Bureau of Land Management, 9 years; State of Indiana, Department of Natural Resources, 3-1/2 years. B.S. Natural Resources - Specialty in Soils, University of Wisconsin.

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Bob Tigner, Planning and Environmental Specialist

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Responsibility: Wilderness EIS Team Leader

Gordon Warren, Public Affairs Officer

Qualifications: Bureau of Land Management, 1 year; Air Force Reserve, 1 year; Newspaper Writer/Editor, 17 years. B.A. Technical Journalism, Colorado State University.

Responsibility: Editing

Technographics Support and Printing

The following personnel from the Wyoming State Office, BLM, provided technographics and printing support in the preparation of this document.

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Coordination, Support, and Review

Printing arrangements were made by the Branch of Administrative Services, Wyoming State Office.

PUBLIC COMMENTS AND RESPONSES ON THE WILDERNESS DRAFT ENVIRONMENTAL IMPACT STATEMENT

Introduction

This section has been divided into two parts. One part is the transcript of the public hearing conducted July 26, 1983, and responses. Part two consists of a total of 47 comment letters from individuals, private organizations, and federal, state, and local agencies on their comments to the Encampment River Canyon Wilderness Draft Environmental Impact Statement.

Hearing Transcript and Responses

The hearing transcript and response appear on pages 138 to 143 of the Final Environmental Impact Statement for the Great Divide Resource Area Resource Management Plan.

Comment Letters and Responses

All comments are printed verbatim. All comment letters are numbered as they appeared in the Final Environmental Impact Statement for the Great Divide Resource Area Resource Management Plan.

One hundred thirty-one letters were received that contained comments on the Wilderness Study Areas. All but the ones herein responded to, contained essentially the comments in Letter 1. Thank you for your comments.

1

August 16, 1987

John Husband
Bureau of Land Management
P.O. Box 670
Rawlins, Wy 82301

Dear Mr. Husband:

I am writing you concerning the Bureau of Land Management's newly released Draft Resource Management Plan for the Medicine Bow/Divide Resource Area in southeastern Wyoming. It is my understanding that the BLM is recommending two Wilderness Study Areas, the Encampment River Canyon and Bennett Mountain areas, be released for oil and gas development and ORV use. Only the Prospect Mountain area, the smallest of the three areas, would be set aside for wilderness. Already, 99.7% of BLM land in the area is ranged. I don't think it is asking to much if we had all three of these areas, which constitute a scant 0.3% of the total BLM holdings in this area, reserved for wilderness.

I hope you, in your position as RMP Team Leader, will push for these areas to be saved for the enjoyment of future generations to come.

Sincerely,

Michael N. Varlick

Response to Letter 1

Thank you for your comments.

2A

D. Sorchord
3495 Unida Pl.
San Diego, CA
92123-2225

Bureau of Land Management
P.O. Box 670
Rawlins, WY 82301

Dear Sirs,

I am writing this letter to express my feelings concerning the Medicine Bow Wilderness supplement. As a former resident of Boulder, Colorado, I can attest to the beauty and need for protection of this a region.

I agree with your Wilderness reccomendation for the Prospect Mountain WSA as it is a nice complement to the North Platte Wilderness. However, I cannot agree with your No Wilderness recommendation for the Encampment River WSA. Although only slightly under 5000 acres, it is large enough to make practable its preservation. As wild rivers become rare, it is important to protect under Wilderness what little remains. Designation of this area as Wilderness would improve the wild experience of recreationist using the River trail through the USFS Encampment River Wilderness. There is little conflict in maintaining this area simple to maintain 1000 RVD's of ORV use, when 7000 RVD's are attested to nonmotorized. It is important that

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-2-

the majority of recreationists are given preference, especially when any ORV use disturbs hikers/hunters/backpackers/fishermen/sightseers, but not vice versa. The ORV use can easily be absorbed by the abundant adjacent roaded USFS and BLM land. It seems that the only significant competition to Wilderness designation is the potential for Fishery improvement. Why not implement improvements along the miles of roaded river downstream, and improve overall fishery quality, rather than marring permanently this wild area. Although you state that 50 boulders and 20 pool structures would be implemented if No Wilderness was chosen, you do not state that roads would be built, nor the impact of these roads to carry the "motorized heavy equipment" needed to place the improvements. Construction and use of roads would highly impact solitude and permanently impact naturalness.

2-1

Wouldnt the ER. WSA acreage be brought above 5000 acres through either exchange of the state section to the south of the unit, or management of this WSA as a unit of the USFS Encampment R. Wilderness? Even without over 5000 acres, this area deserves reccomendation for Wilderness designation to prevent degradation of this irreplaceable resource.

One thing I found lacking in the

Response to Letter 2

2-1. The fishery section has been removed from this document.

2-2. Exchange of State Section 36 has been considered. However, there is a patented mining claim within Section 36 so the exchange was not pursued.

2-3. The Impacts are analyzed in the EIS. The rationale will be in the Wilderness Study Report.

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-3-

Medicine Bow Wilderness Supplement is that, although the Preferred alternative and associated impacts are clearly stated, rationale for the preferred alternative being chosen is never given. Expressing my position would have been easier if you had explicitly stated your reasoning in choosing the preferred alternative.

2-3

Thank you for this opportunity to comment.

Thank you,
Tom Sanford

BLM LANDS FOUNDATION
BOX 16 • PARK RIDGE, ILLINOIS 60068

3

August 26, 1987

Mr. John Husband, RMP Team Leader
BLM
Rawlins

Dear Mr. Husband:

I would like to commend you for the recent Draft RMP/EIS.

I do have one question re. the Wilderness part. Whatever happened to #030-305.... The Pedro Mountains?

3-1

Thank you for your help.

Very truly,

GEORGE EARLY

Response to Letter 3

3-1. The decision by the BLM to retain the Pedro Mountains WSA was appealed by Conoco to the Interior Board of Land Appeals (IBLA). The IBLA upheld the appeal and the Pedro Mountains were removed from the wilderness inventory.

THE STATE OF WYOMING

MIKE SULLIVAN
GOVERNOR

GORDON W. FASSETT
STATE ENGINEER

4A

State Engineer's Office

HERSCHLER BUILDING CHEYENNE, WYOMING 82002

August 20, 1987

Richard H. Miller
State Planning Coordinator's Office
Herschler Building
Cheyenne, Wyoming 82002

Re: Medicine Bow - Divide Resource Management Plan/Draft EIS/ Wilderness Supplement State Identifier Number 86-240

Dear Mr. Miller:

We found little to comment upon in our review of this RMP.

In the Chapter on Affected Environment, Surface Water, Page 137, we would suggest the 1st sentence could better read: "Surface water use on the public lands in the planning area is mainly livestock watering and wildlife watering." - Otherwise the sentence is misleading because these are not the main water uses except on the public lands.

The remainder of the 1st paragraph is extremely brief with much detail left out. For example, hydropower is generated at Seminoe Dam, Fremont Canyon, Alcova Dam and Glendo Dam. In addition to Kortes Dam, which is mentioned. Also, there are numerous irrigation reservoirs not named - some of which impact the public lands, such as Lake Hattie in the Laramie River Basin, and many reservoirs used for fishing, recreation, and wildlife habitat, in addition to other uses.

There is little mention of irrigation uses of water, and no mention of the fact that the resulting hay base produced from irrigation, together with grazing on the public lands, provide basic natural resources for agricultural industry in the planning area.

This office and the BLM have a long-standing cooperative agreement under which water rights information and cooperation on applicable permit ownerships are conducted. We presume that the BLM will continue to apply for the applicable water rights permits, as required by State law, before constructing diversions, detention structures, stock ponds, reservoirs, and other types of permits.

Before using water for temporary industrial purposes, such as road, oil and gas well, and other construction, and for management practices such as fire control on planned burn fire suppression projects, a permit from the State Engineer must be applied for and approved. This is true for public agencies as well as for temporary uses proposed by private interests. A significant portion of the planning area is in the area upstream of the North Platte Reservoir system where senior priority

Richard H. Miller
Page 2
August 20, 1987

4B

water rights are the provision of the U.S. Supreme Court Decree on the North Platte River system restrict the availability of surplus water available for new priority temporary use permits. Often there will be no water available for such use at all in a given water year from the main stem North Platte River or from the North Platte tributaries above Pathfinder Dam. In such circumstances, and on other streams and rivers during the irrigation season, or during the off-season and spring reservoir refilling periods, water may not be available to a present priority temporary use permit because of calls for regulation to satisfy the senior priority water rights. During such time periods, it may be necessary to obtain water for the temporary use from existing valid appropriations, which are in priority, by water agreements filed with and approved by the State Engineer.

In our review of the Wilderness Supplement, we found that the proposed Encampment River Canyon WSA would affect an active ditch and possibly affect the associated water rights. We suggest the WSA boundary be moved upstream of the headgate of the affected ditch far enough to allow normal maintenance by the ditch owner(s) without having to notify BLM. The water rights and ditch are:

Permit No. 5057, Bashore Ditch, A.J. Anderson, appropriation, Certificate Record 24, page 221, proof 9526, priority date 9/13/1902, for irrigation of 33 acres, 0.5 cfs from Miner Creek, tributary South Fork Grand Encampment River, diverting in the NE¼NE¼ Section 24, T.14N., R.84W.

Thank you for the opportunity to comment on this resource management plan.

Very truly yours,

Frank J. Trelease

FRANK J. TRELEASE
Assistant State Engineer

FJT/llv
Enclosure - Referral Memo
cc: Gordon W. Fassett
State Engineer

Response to Letter 4

4-1. On October 20, 1987 personnel from the BLM conducted a field investigation regarding a comment your office made (letter dated August 20, 1987) concerning a headgate and associated ditch in the Encampment River Canyon Wilderness Study Area (WSA).

Our analysis has revealed that the headgate is located in Section 23 instead of Section 24. The Bashore Ditch, listed as Permit No. 5057, has not been actively used mid-way through the I.O.O.F. Camp and northward for over fifty years.

Some of the ditch is still visible mid-way through the I.O.O.F. Camp and northward but most of it has been obliterated by road construction, dissected by rock slides and gullies, overgrown with trees and brush and is not actively used.

In addition, outhouses and other man-made structures have been erected on the ditch within the I.O.O.F. Camp.

We discovered that the I.O.O.F. does maintain the headgate and uses approximately 1/3 mile of ditch to water lawns in the I.O.O.F. Camp.

According to their records they have obtained the rights to use the ditch under Permit 21873 B9, issued to the I.O.O.F., Rawlins Lodge No. 4 on July 7, 1958. It is recorded in Book 74, Page 30, in the State records.

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WYOMING WILDLIFE FEDERATION

Wyoming Wildlife Federation
P.O. Box 106, Cheyenne, WY 82003
307-637-5433

September 11, 1987

Mr. John Husband
BLM - Rawlins District
P. O. Box 670
Rawlins, Wyoming 82301

Dear John,

Thank you for allowing the Wyoming Wildlife Federation to review the Medicine Bow-Divide Resource Areas Draft EIS of the Resource Management Plan.

We hope that our concerns will be considered as you compile the final RMP.

Enclosed are our comments.

Sincerely,

Matt Reid

Matt Reid
Conservation Program Director

MR$/cp

WORKING TODAY FOR WILDLIFE'S TOMORROW!

Wyoming Affiliate of the National Wildlife Federation

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Wildlife and Fisheries

As a planning document this RMP and DEIS are inadequate primarily for two reasons: 1) the documents consider wildlife an unequal resource secondary to development of mining, oil and gas, forest products and livestock grazing; and 2) the documents do not protect the wildlife resource from habitat and population degradation.

There is no specific means by which this plan's wildlife goals can be measured. It is a confusing, hard to follow document that gives commodity outputs high priority at the expense of wildlife and fisheries resources and the habitat these resources depend upon. There is no attempt to integrate the management of any of the resources identified in the plan.

Wildlife outputs will remain the same even though BLM agreed to increases in some herd objectives proposed by the Wyoming Game and Fish Department.

Wildlife and wildlife habitat will diminish as a result of proposed increases in all of the commodity outputs. It is hard to imagine even maintaining 1988 wildlife population objectives.

Raptor protection is extremely weak. One of the raptor protection goals is to allow for oil, gas and coal development. This is not a goal to protect raptors, which are federally protected species.

5-3 WWF does concur with the development of Habitat Management Plans (HMP). Overlapping special crucial ranges should be given special consideration in HMP development.

Livestock Grazing

There are problems with overgrazing in the resource areas.

According to the draft RMP 28.4 % of the range is in only fair condition while 1.1% is in poor condition; 81 grazing allotments have a downward ecological trend; and 42% of the public land requires range rehabilitation because of inadequate range production or species composition, downward range trends, poor animal distribution or improper seasons of use and turnout dates.

The above data from the draft EIS indicates that there are serious range conflicts associated with livestock occurring on the public lands within the BRA.

This becomes especially disconcerting when compared to the draft's proposed call for a 18% increase in grazing AUMs. This increase is to be allowed as a result of an alleged increase in range productivity.

Response to Letter 5

5-1. Please note that the cattle exclosures are not included in the final EIS.

5-2. Allotment boundary fences are not proposed by BLM but would be addressed if permittees requested them. Before any fence would be constructed an Environmental Assessment would be prepared, at which time the cost would be analyzed.

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WWF is very skeptical that any increase in grazing AUMs can result from increased range productivity on the RMA in light of the poor range conditions documented in the draft without first reducing AUMs temporarily.

The plan is deficient because it makes no attempt to analyze the impacts of current grazing patterns on soil, water and habitat resources. It is also very sad that riparian habitat protection on a multi-million acre desert resource area has been relegated to a token 67 acres. Riparian habitats on the RMA need much more consideration for protection and enhancement.

Minerals, Oil and Gas Management

The environmental impacts of mineral development have not been specifically addressed in the draft EIS. There has been no environmental analysis of oil and gas leasing, although over 5 million acres of the RMA are leasable. This is a problem. Once BLM has issued a lease, development cannot be stopped. These mineral, oil and gas leasing impacts must be addressed specifically and cumulatively if the plan is to be a realistic document.

Revised Coal Appendix

WWF supports the structural changes to the draft appendix agreed upon by the Wyoming Game and Fish Department, National Wildlife Federation, Wyoming Wildlife Federation and BLM at the consensus meeting of late August 1987. These structural changes enhance the document's wildlife mitigation measures.

WWF strongly recommends that no action be taken with the Wild Horse Draw Mine proposal until reclamation is proven successful on other leases, especially China Butte.

The China Butte mine plan mitigations have been agreed upon except for an agreement to reduce grazing pressure in allotments to the south of Muddy Creek. All agreements must be based upon this reduction of livestock grazing occurring.

At the Atlantic Rim proposed mine the only acceptable route for road and rail facilities is the 20 mile road. Any other route will dramatically impact wintering wildlife.

Proposed mitigation for the loss of elk forage (in regards to item 4, page 28) includes livestock grazing reductions in both the Atlantic Rim and Cow Butte areas to offset the direct loss of forage and displacement of elk.

We must stick to the original mitigation agreements between Rocky Mountain Energy, NWF, WWF, Wyoming Game and Fish Department and the BLM.

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There should be no mine activity at the Cow Creek mining proposal area until Atlantic Rim is fully reclaimed and usable as elk winter range.

Forestry

The claim that the creation of a 60/40 forage/cover ratio in all commercial timber areas will improve big game habitat is fallacious and simplistic. Most timbered BLM tracts are small and adjacent to large areas of non-timbered lands. In such cases the cover value of the timber may be much more important than the forage value. The limiting factor for elk may not be forage, but escape cover. In such cases if cover is removed by logging the habitat effectiveness of the area will be decreased, and carrying capacity will be lost.

The WWF urges the BLM to reconsider logging in areas that provide necessary hiding cover for big game and analyze the effects that clear cutting would have on habitat effectiveness before deciding to remove timber. The 60/40 forage/cover ratio should be applied to a minimum of 3,000 acres and preferably 5,000 acres of habitat to be meaningful, not just a few hundred acres that the agency chooses to manage.

Another questionable assumption that the BLM makes is that beetle-infested timber must be removed to create a healthy forest. This is not necessarily true. Unmanaged beetle-infested timber will, over the years, die and fall and be replaced naturally by younger trees. The organic material from the dead trees will be returned to the soil to nourish the new growth. The new trees will not become infested until they reach a diameter of 8", at which time the cycle may repeat itself. This may take 100 years in this climate.

The WWF asks the BLM to evaluate the costs of administering timber sales and limit sales to those areas where it will be profitable for the agency. BLM should consider prescribed burns in areas where beetle kills are most severe and logging would not be profitable.

Recreation

Recreational opportunities by type and area need to be defined. An OHV plan needs to be specifically implemented and then enforced. Critical wildlife winter and birthing areas, erodible habitats, sand dunes and riparian zones should be strictly off limits to OHV use.

Primitive and semi-primitive opportunities and areas need to be specifically addressed and identified.

Hunters spent over 15 million dollars in the Rawlins RMA during 1985. In light of the energy slump this economic benefit becomes even more significant.

5E

In the planning document, this important recreational pursuit is given secondary priority to major big time BLM money losing programs such as livestock grazing and logging. It is also assumed that this region can sustain unlimited coal mines and oil and gas wells while maintaining a huntable big game resource at the same time. This is unrealistic. The plan is not a multiple use document. It is a document that features energy development as a primary theme. The wildlife resource and the people who live within the BMA will be the losers over the long term if this document is not changed.

Wilderness Study Areas

Wilderness recommendations for Bennett Mountains, Prospect Mountain and Encampment River Canyon seem arbitrary and show an unwillingness to change the status quo. No reasons are given for either the wilderness or non-wilderness recommendations.

Bennett Mountain. Even though expected oil and gas exploration would disturb only 20 acres, there are no mining claims in the WSA, and continued ORV use would degrade opportunities for solitude and primitive recreation (p. 83, Wilderness Supplement), the WSA is recommended for non-wilderness. The reason for this is not given.

Since the WSA offers the only opportunity for high quality primitive recreation and solitude for many miles the BLM should preserve this opportunity rather than allow it to be degraded over time by the insidious encroachment of incompatible uses. None of the other values such as water quality and livestock grazing apparently would be adversely affected by wilderness designations according to the document. WWF urges the BLM to recommend Bennett Mountains WSA for wilderness designation.

Prospect Mountain. WWF commends the BLM for recommending Prospect Mountain for wilderness designation. Although it is only 3,145 acres in size, it contains important winter mule deer habitat and crucial elk winter range. But since riparian areas comprise only 3% of the WSA it is crucial that they not be overgrazed by livestock in the summer so that they can provide adequate forage for winter survival of dependent wildlife. Huntable game animals are much more important to local economies than livestock grazing, and should be allowed protection from livestock competition on crucial wintering areas.

Encampment River Canyon. It seems incredible that this WSA is not recommended for wilderness designation. It has outstanding opportunities for primitive recreation and solitude; it has very good trout fishing; it is crossed by a Forest Service maintained trail that could connect with the Continental Divide National Scenic Trail and access the Encampment River wilderness on the National Forest upstream, and a portion of a 1-mile-wide corridor along the Encampment River that is proposed for National

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Natural Landmark status is in the WSA and is very scenic.

In addition to all these attributes the entire canyon is crucial winter range for bighorn sheep. Repetition of recent bighorn population declines caused by ORV harassment and forage competition by cattle could be alleviated by wilderness designation and elimination of cattle from the WSA. The DEIS suggests constructing livestock exclosures around impacted camping areas on the river. This likely would not only be economically infeasible, but would detract substantially from the primitive recreation experience. Who wants to camp in a corral? It also would not alleviate the competition for forage by cattle concentrating in the critical riparian areas. 5-1

There are no existing oil and gas leases in the WSA, and potential for oil and gas is low. Expected mineral exploration would not materially affect wilderness values, and the 17 existing mining claims concentrated along the border of the WSA are not expected to be developed.

No cost analysis of the new allotment boundary fence proposed to control cattle movements in the WSA is offered. It is unlikely that the proposed fence would prevent significant livestock competition for forage in the critical riparian areas, and it is likely that the cost of the boundary fence along with the cost of campsite exclosures would make the projects far from cost-effective. 5-2

WWF strongly suggests that cattle grazing be phased out of the WSA to provide forage for the more economically important bighorn sheep. It makes no sense to invest money to perpetuate a use that is in direct competition with another use that will return considerably more money to the local economy without any investment at all.

If stream habitat improvements cannot be made without building roads they should not be done. If they can be done without harming the wilderness quality of the WSA they should be done before it is designated wilderness.

The WWF urges the BLM to manage the Encampment River Canyon WSA for its highest and best use, which is bighorn sheep habitat and wilderness. In an area of the state now being severely impacted by road building, intensive logging and a large scale water diversion project. An opportunity to preserve a small area for primitive recreation and wilderness solitude should not be lost. There won't be any more such opportunities coming along.

Comments Medicine Bow/Divide Draft EIS

Cost Benefit Analysis:

The most glaring flaw in the BRP is the lack of a cost

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analysis of any management proposals. How can the grazing program, for instance, be evaluated without knowing what the returns and costs are? Why are gross income figures presented for timbering but not for any other program? If the returns to the state's economy vs. cost associated with providing wildlife habitat were compared with costs and returns from the livestock grazing programs there is little doubt that wildlife habitat would provide the most net benefits to the state. There is room for both livestock and wildlife, but in few cases where livestock limit big game numbers by utilizing forage from wildlife winter ranges WWF urges the BLM to reduce livestock numbers where needed to allow enough game animals to survive the winters to meet Wyoming Game and Fish Department herd objectives.

The RMP says it will meet herd objectives in most cases, but fails to say how it will accomplish this while increasing livestock AUMs by 27% above the 5 year average at the same time. Intensive herd management is mentioned, but associated costs and benefits are not analyzed. Are the costs of these programs of no concern to you? They certainly are to us and should be to the public.

ACEC's

WWF concurs with the ACEC list provided on page 19 of the draft. All of the proposed areas should receive ACEC designation. WWF also supports putting overlapping crucial ranges for mule deer, elk, bighorn sheep and antelope into ACEC designation. These areas can be determined in consultation with Wyoming Game and Fish Department. All raptor nesting areas should be given ACEC designation.

Monitoring

This plan is in direct violation of FLPMA. No monitoring plan is provided to determine on-the-ground impacts of the proposed developments on wildlife, soil, water and air resource. The final must have a monitoring plan. WWF would appeal this plan on that point alone.

Proposed Public Land Disposal

The proposed disposal of 103 square miles (66,000 acres) of public lands in the Medicine Bow-Divide Resource Area appears to be an attempt to implement the privatization proposals of past Interior Secretary James Watt which were blocked by Congress.

Such a large scale disposal of public lands is not in the public interest. It is also inconsistent with the RMP in that lands slated for disposal in the northwest portion of T.21 N. R. 87W (Resource Management Plan DEIS. Map 6. page 75) were identified as needing additional land acquisition to improve public access for recreational use (Resource Management Plan DEIS. Map 13.page 81).

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The BLM's reasons for the privatization of these public lands are that they are isolated and difficult to manage. Yet a large number of these lands have legal public access in the form of federal, state, and county roads and provide important public recreation benefits.

The Wyoming Wildlife Federation asks that the BLM clearly state in the final plan what legal public access is available to each parcel of public land it targets for disposal as well as the net effected disposal will have on public benefits. In addition, maps should be provided in the plan that show all public access roads in the vicinity of the lands proposed for disposal.

The BLM confuses the disposal issue by claiming the lands proposed for disposal may be scheduled for trade as well as out right sale (Resource Management Plan DEIS, page 110). However, since no specific plan for trading these lands is discussed in the plan it is likely that most of these lands will be sold. The final plan should state where possible which lands are scheduled for trade, and which are scheduled to be sold. In order to maintain credibility with recreational users of public lands, the BLM must work to increase the accessibility of those lands where feasible, instead of disposing of them.

Demands for recreational use of public lands is increasing thereby underlining the importance of increasing access to public lands as well as keeping public lands public. The BLM should put more emphasis on land trades rather than disposal in order to solve management problems and keep lands open to public use.

51

Comments on the Appendices of the DEIS

Forestry Appendix - The stand eradication projects discussed here are simply described as complete removal of existing trees to repair the area for regeneration. Stand eradication projects that completely remove every tree are going to eliminate habitat for martin, owls, kestrels and other cavity nesters. Old growth should be recognized as something more than a useless patch of habitat.

WWF advocates nearly universal road closures in forested areas because after looking over all of the appendices, and noting the extent of known geologic structures it is obvious that wildlife habitat is going to be at a premium. Contiguous habitat is going to be very scarce.

Limitations on activities in the vicinity of active raptor nests seem to be predictive in nature. For example, they will not allow an activity within one mile of a certain nest between date e and date b if the activity will result in nesting failure and abandonment. This seems to be more of a loophole than a guarantee to prevent impact. If the activity will disturb the nesting activity, impacts are not going to be known until after they happen. For the sake of wildlife we ought to presume that the activity would interrupt the breeding activities of the species and the buffer zone should be enforced in every instance.

Livestock Grazing - Most grazing leases are in C conditions. As a result WWF believes it is time the BLM got tough with their lessees. This is not private land; it is meant for multiple use and the BLM ought to increase its field presence in order to achieve range improvements by enforcing cooperative plans with lessees. BLM should grazing permits instead of merely issuing warnings where permittees continue violations.

WWF also supports that no exceptions be made to fencing criteria. There have already been too many exceptions made statewide to the detriment of free roaming wildlife. WWF supports no loopholes in fencing standards.

WSA's should be 'hands off' for rangeland improvements. The BLM is very short on wilderness areas and to take a chance on compromising a WSA before it can be considered as wilderness is to lessen its chances of being designated that way.

All livestock operators should be required to file actual use reports showing how many livestock graze in each allotment and/or pasture and for how long. The BLM will supervise use on allotments throughout the grazing year. The word will definitely be replaced by the word 'will'.

Statewide we know that public land has been abused.

5J Permittees have run more cattle then they said they had, and the management practices often have been inadequate to maintain range conditions as is indicated by the level c condition of almost every grazing allotment in the management area.

The BLM should state their legal right to suspend grazing rights to any lessee who denies access to the public. It is public land and anyone who violates that access to the public should be warned that they are going to lose their grazing lease. It is time the BLM started to exercise that prerogative; to our knowledge this has never been done in Wyoming.

WWF supports the BLM's desire to improve priority 1 water systems, including Bear Creek, Sage Creek and Haggerty Creek. The Sage Creek drainage causes a major degradation to the fishery of the North Platte River. The North Platte changes from class 1 to class 2 at the confluence of Sage Creek. Obviously pollution to Sage Creek must be cleaned up to save the potential class 1 fishery of the North Platte below its confluence. Cattle grazing is apparently a major cause of sedimentation and should be controlled.

Wildlife - Aquatic Wetland improvement plantings indicate that about 240 acres of aquatic wetland plantings are spread out over 4 HMP's. This seems inadequate considering the damage that has undoubtedly occurred to wetlands areas as a result of overgrazing. Wetland improvement is usually necessitated by grazing practices and this goes back to the grazing appendix where most of the allotments are in category c, and here we are improving only a small portion. More effort should be directed towards correcting damage to wetlands, or grazing allotments should be reduced if damage cannot be controlled.

There are only two acres in all of the HMP areas for Colorado cutthroat enclosures, and the two acres are in the Baggs HMP which indicates a single project. This is wholly inadequate for the same reasons that the aquatic wetland improvement program is inadequate. Obviously cattle do damage to riparian habitats, causing siltation and reduction of trout habitat, but only two acres of all the water sheds in the entire district are being excluded from livestock grazing to protect the valuable Colorado cutthroat fishery.

WWF advocates that fences that have been given exceptions or that have been found to be in violation of fencing stipulations should be returned to their correct standards.

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Conclusion

This is an inadequate planning document that needs major changes. We make the following recommendations:

1. Make the planning document trackable and easier to read;
2. Integrate the resources management in a meaningful way;
3. Treat wildlife as a primary resource rather than a resource that is 'mitigated', 'coordinated' or 'adjusted' as needed to accommodate commodity output.

That is not multiple use;

4. Develop a cost benefit analysis of all management programs;
5. Develop a monitoring plan and implementation schedule;
6. Decrease livestock grazing to the point that fair to poor condition ranges can improve their productivity;
7. Scratch all uneconomical (below cost) logging;
8. Intersperse economically justified logging with wildlife objectives of BLM and the Wyoming Game and Fish Department;
9. Amend and improve the coal appendices based on Agreement with RWF, RWF, BLM Wyoming Game and Fish Department and the U. S. Fish and Wildlife Service.
10. Develop a specific recreation plan by type and area. This includes primitive and semiprimitive recreation, hunting and fishing. Acknowledge the significance of hunting and fishing recreation; and
11. Specifically develop planning for immensely increased protection of riparian habitats, crucial winter ranges, rare habitats and critical wildlife habitats.

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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION VIII
999 18th STREET--SUITE 500
DENVER, COLORADO 80202-2405

Ref: 8PM-EP

SEP 1 4 1987

John Husband, Team Leader
Bureau of Land Management
Rawlins District
P.O. Box 670
Rawlins, Wyoming 82301

RE: Medicine Bow-Divide Draft Resource Management Plan/Environmental Impact Statement (RMP/EIS), and Medicine Bow Wilderness Supplement

Dear Mr. Husband:

In accordance with the National Environmental Policy Act (NEPA) and our responsibilities under Section 309 of the Clean Air Act, the Region VIII office of the Environmental Protection Agency (EPA) has reviewed the referenced documents. The EPA appreciated the opportunity to meet with you in July, 1986. The meeting was followed up by EPA's scoping concerns for the project which were sent on August 27, 1986. In addition to environmental conditions and effects, our review is also focused on the RMP as "a comprehensive framework for managing and allocating public land and resource uses" (page 1). Our enclosed detailed comments are intended to make a constructive contribution to this "comprehensive framework".

Based on our concerns and the criteria EPA has established to rate adequacy of draft EISs, we have rated this draft RMP/EIS as Category EO-2 (environmental objections-insufficient information). A summary of our EIS rating definitions is enclosed. The major concerns/recommendations addressed in our detailed comments relate to:

- better description of consistency with water quality standards (existing/designated beneficial uses, use protection criteria, and antidegradation requirements) and the Federal/State water quality management programs,
- inconsistent and insufficient level of analysis of effects on surface and ground water resources/beneficial uses in relation to applicable statutes,
- additional documentation of guidelines/requirements for oil and gas, and coal development,
- questions on adequacy of range management plans to support multiple rangeland values under applicable statutes,
- providing objectives for Areas of Critical Environmental Concern (ACEC) management that are adequate to assure resource protection and for consistent ACEC recommendations by alternative,

Response to Letter 6

6-1. The four allotments which are included within the boundary of the Encampment River Canyon WSA have all been categorized as "Improve" category allotments and are listed as high priority to receive management plan development. Any actions implemented to mitigate conflicts or improve resource conditions identified during the categorization process will be addressed through consultation and coordination with all affected interests. The riparian areas would be incorporated into any activity plan developed for the area.

Also see general response Number 7 and the response to comment 32 of this letter. They appear in the Final EIS for the Great Divide Resource Area Resource Management Plan and are reproduced here.

7: Riparian Vegetation

Several letters expressed concern about improvement of riparian areas in the planning area.

In the more than 1 million acres of public land in the Medicine Bow grazing EIS area, it is estimated that approximately 3,911 acres contain riparian vegetation. This is less than 3/4 of 1% of the public land in the

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- o providing additional guidance and documentation needed for protection of riparian and wetland values,
- o development of a framework for Clean Water Act/water quality standards and ground water monitoring,
- o and inclusion of more specific plans for coordination and implementation, among other items, in an implementation chapter or appendix.

Several features of Alternative B are identified, which would also improve the preferred alternative:

The draft RMP/EIS contains commendable objectives to "meet or exceed established standards for quality of surface water and groundwater . . . where degraded by unnatural causes" (page 81), and to use Wyoming's WQS as "standards" for the planning area (page 466). Our review has identified questions of consistency, and some commendable approaches to management of water resources and it's ecological integrity.

Wyoming's water quality standards (WQS) currently set antidegradation requirements only on Class 1 waters. Since EPA's antidegradation requirements apply to all waters of the United States, Wyoming will be addressing EPA's requirements this year as part of the triennial review of its WQS. We encourage the BLM to be part of this process and be aware of the applicability of any new requirements that may apply to BLM streams. The State of Wyoming contact person is John Wagner in Cheyenne (777-7078) and the EPA contact person is Jim Lazorchak (FTS 564-1581 or 303-293-1581).

We would appreciate the opportunity to discuss with the BLM its proposed responses and RMP/EIS revisions relating to EPA concerns prior to the RMP/Final EIS. Based on experience reviewing these documents, such a coordination process would be beneficial in helping address our concerns. Please contact Douglas Lofstedt of my staff as needed for further EPA coordination at 303-293-1717 or FTS 564-1717.

Sincerely,

Robert H. DeLaquin

Robert H. DeLaquin, Chief
Environmental Policy Branch
Policy and Management Division

Enclosures

cc: Hilary Oden, Wyoming BLM State Director
David Williams, Office of Planning and Environmental Coordination, BLM Washington Office
Randy Wood, Director, Wyoming Department of Environmental Quality
William Dickerson, EPA Office of Federal Activities

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EPA DETAILED COMMENTS ON THE BLM DRAFT
MEDICINE BOW-DIVIDE RESOURCE MANAGEMENT PLAN
AND ENVIRONMENTAL IMPACT STATEMENT

Water Quality Standards, Watershed

Our review of water quality and ecological integrity of water resources is based on consistency with:

- o Wyoming's water quality standards (WQS) and water quality management program;
- o Federal agency leadership responsibilities to "protect and enhance the quality of . . . water. . . resources" (page 466) through meeting applicable standards (Executive Orders (EOs) 11752 and 12088 and Clean Water Act Section 313);
- o requirements for RMP consistency with "officially approved or adopted resource related plans, and the policies and programs contained therein, of other Federal agencies, State and local governments" in 43 CFR Part 1610.3-2;
- o Federal Land Policy and Management Act (FLPMA) policies to "protect the quality of ecological, environmental, . . . and . . . water resource . . . values" (Section 102(a)(8)) and to meet applicable State and Federal "pollution control laws" and water pollution "standards or implementation plans" (Section 202(c)(8));
- o the Clean Water Act (CWA) objective to "achieve and maintain physical, chemical, and biological integrity of the nation's waters" (Section 101(a));
- o and "NONPOINT SOURCE CONTROLS AND WATER QUALITY STANDARDS" guidance (August 10, 1987) from Chapter 2 of EPA's Water Quality Standards Handbook.

The draft RMP/EIS contains commendable objectives to "meet or exceed established standards for quality of surface water and groundwater . . . where degraded by unnatural causes" (page 81), and to use Wyoming's WQS as "standards" for the planning area (page 466). Our review has identified questions of consistency, and some commendable approaches, regarding management of water resources and it's ecological integrity:

- o The discussion of surface water uses should be expanded to include the beneficial uses prescribed in State WQS (pages 137 and 140).

grazing EIS area. There are approximately 110 acres of riparian vegetation in the WSA. Of the riparian vegetation that has been inventoried, the ecological range condition of less than 9% is good or excellent, 66% is in fair condition, and 25% is in poor condition.

In the allotments scheduled for AMP development ("I" allotments), livestock grazing would be excluded for an estimated total of 67 acres of riparian areas until their condition could improve enough to support limited seasonal grazing. In addition, riparian pastures would be included in grazing systems to be developed, or other treatments would be used to improve riparian areas. It is estimated that 1,658 acres of riparian areas would be improved.

Existing riparian vegetation could be improved, and possibly new riparian vegetation could be created, through construction of reservoir fences to exclude livestock, with water piped to a trough outside the fence. Approximately 56 acres surrounding existing reservoirs could be improved in this manner.

An approximate total of 1,781 acres of riparian areas are proposed for improvement actions in the proposed RMP. This is 46% of the riparian vegetation in the Medicine Bow grazing EIS area. Specific grazing treatments, monitoring systems, and schedules will be established as AMPs are developed.

Other actions to improve riparian areas and address small problem areas can be taken regardless of the allotment category. A detailed inventory of riparian area condition and management needs will be a high priority workload involving considerable effort during the first few years of implementation.

Requests for changes in kind of livestock from sheep to cattle would be considered along with management actions to maintain or improve riparian condition.

32. Improvement or enhancement of riparian areas is movement toward a higher level of value or desirability. This may be measured by a number of methods, including ecological condition, stream bank and channel stability, suspended sediment sampling, water quality, riparian community classification, and benthic macroinvertebrates composition and diversity.

Grazing management systems with their associated range improvements are the principal tools available to improve the condition of the vegetative resource, both upland and riparian. Fencing to exclude

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- Similar to other RMP/EIS's, the statements are made that the alternatives would provide for maintaining existing water quality (page 18 and 23). However, just maintenance of existing water quality may or may not meet CWA, FLPMA, and EO objectives depending on the amount of existing degradation; nor is there a recognition of providing full protection of existing beneficial uses (which are part of WQS). The intent to maintain water quality seems to be contradicted by other statements, such as on page 271 and 290 where "degradation of water quality" would be held to a "minimum", and on page 289 where grazing management would reduce "degradation of water quality" in "I" allotments. Also, we question why consideration for "watershed conditions, wildlife habitat, and riparian vegetation" is only for certain areas (page 19) rather than the whole resource area. More definitive RM criteria and standards are needed to provide CWA and FLPMA consistency and guidelines for activity planning, and to describe the "levels of . . . protection to be maintained" as required on page 8. Also, the emphasis on "Maintenance of Class I streams" as "first priority" (page 22) raises a question of meeting WQS in Class II through IV streams that should be addressed.

- Under FLPMA requirements to "protect the public lands from unnecessary and undue degradation" (page 124), BLM's policy for managing activities such as mineral development to meet WQS needs to be clearly defined in the text. For example, water quality could be degraded from oil and gas development and grazing under Alternative C (page 273). In fact, there could be "highly detrimental long-term impacts" to "open waters and riparian areas" from oil and gas development (page 280), implying CWA and FLPMA violations.

  Another example is the North Platte River which would be managed as a special recreation management area (SRMA) under all alternatives (page 3). However, the land adjacent to the North Platte River "could become unavailable for recreation and the quality of fishing could decline" under the preferred alternative because of locatable mineral development (page 91). It does not appear that an SRMA designation would contain effective management mechanisms, and the potential decline of fishing quality implies a potential for WQS/beneficial use violations.

- The preferred alternative would "restrict surface disturbance and reduce the potential for soil erosion" on 864,975 acres to protect riparian areas (page 93). Yet, in only "critical watersheds" would management be taken to "minimize soil erosion and degradation of water resources" (page 93). Consequently, the question of consistency is raised again in relation to CWA and FLPMA policies of protecting ecological, environmental, and water resource values. What happens to those watersheds not deemed "critical"? "General practices" are listed to improve water quality in "important" watersheds (page 465). What are the criteria for identifying "critical" versus "important" watersheds? The "general practices" are simple but good environmental techniques. Why would they not be applied to activities in all watersheds with monitoring to ensure proper and effective application?

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The cumulative ground water impact in areas not designated as "critical" should be assessed in this EIS. The use of unlined brine pits allows infiltration of saline water into the shallow ground water systems. By issuing additional leases which allow this practice (even in "unimportant" watersheds) the potential for significant impacts to the area's ground water resource is heightened. This contamination will have direct impacts on wildlife and vegetation at local points of discharge (springs and seeps).

- We request that the RMP/EIS deal more thoroughly and clearly with objectives for health of the aquatic systems. One area of confusion is the objective to be achieved. According to page 96, "85 miles of trout stream habitat would be enhanced". Elsewhere, a "positive effect" is to be achieved. On page 289, the intent is to "maintain or improve" the "85 miles of trout stream". Is "maintain" a contradiction? The definition of "positive effect" as an objective for aquatic habitat seems too vague and can even mean only a reduced rate of degradation (page 223). Likewise, what does "enhances" mean? Yet, "All alternatives should contain provisions" for sufficient habitat to meet the "population goals established for all wildlife species in the WGFD strategic plan" (page 23). We could not find that the objectives for "positive" or "enhanced" habitat effects are adequate to meet habitat goals, what the "sufficient" amount of aquatic habitat is by alternative, whether the fish population goals are consistent with the WQS, and whether BLM policies in the definition of a "positive effect" or "enhanced" meets CWA and FLPMA objectives. Also, all alternatives would prevent "significant damage" to "fish . . . communities" (page 65). We were unable to find RMP/EIS criteria for improvement or allowable degradation of aquatic life/ecosystems that corresponds to FLPMA and CWA objectives and that will provide a basis for activity plans.

  Oil and gas development would have "protective measures", in areas of "important . . . fish habitat" (page 27). Likewise, "long-term disturbance" would be avoided in "high priority standard . . . fisheries areas" (page 66). How was the distinction of "important" or "high priority" made and how are such distinctions consistent with FLPMA and CWA objectives? Would WQS be violated in "unimportant" streams?

- Potential impacts to surface and ground water are a concern with several potential coal lease areas (pages 314-315). Why were only the potential effects on ground water discussed on page 314? The RMP/EIS makes the determination that the new lease areas are acceptable regarding surface and ground water impacts. We question this determination without more specific requirements for acceptable impacts to be met prior to issuing a lease. For example, in two places the discussion prescribes mitigation only to "reduce" the impacts. However, just reducing the impacts may or may not comply with the various applicable statutes and standards. Also, WQS are related only to monitoring plans on page 315, not lease operating requirements. Allowable impairments in beneficial uses should also be part of the information submitted by lessees (and approved by Wyoming DEQ). What violations will prompt enforcement action by BLM?

livestock is but one component of grazing management.

Livestock grazing is a compatible use in riparian areas when properly managed. However, exclusion of livestock grazing may be necessary for a period of time sufficient to achieve a level of recovery and stability which can support grazing while meeting management objectives. The BLM has released a *Draft Technical Reference on Grazing Management in Riparian Areas*, which addressed these concerns (USDI, BLM 1987).

Corrections for table LVGR-AP-4 appear in the Livestock Grazing appendix to this proposed RMP/final EIS.

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In addition, we found insufficient discussion of effects of coal activity on aquatic life/ecosystems in Chapter Four. Likewise the analysis of effectiveness of proposed mitigation to protect Seminoe Reservoir and associated stream beneficial uses is insufficient.

- The Wyoming DEQ has recognized the need to set up a "management and sediment control study" to address the major cold water fishery impairments in Bates Creek (page 468). The source of impairment is sediment probably from "accelerating gully erosion from grazing lands." What does the RMP propose for resolving the problem?

- The management actions for "M" allotments call for improving balanced use, "range condition, and productivity without damage to existing resources" (page 370). These objectives appear to contradict the preferred alternative's intention to "not improve" ecological conditions of "other allotments with a downward trend" (apparently M, C, and some I allotments) resulting in continued decline of vegetative cover, and "reduced water quality and increased rates of accelerated erosion" (page 289). Consequently, the question of whether the preferred alternative is complying with the statutes, EOs, and other RMP/EIS direction for WQS should be addressed.

- The RMP/EIS should describe the "Emphasis" that will be placed on management of municipal and/or domestic water supply watersheds (page 22).

- The preferred alternative would have "short term . . . local degradation of air and water quality" from forestry activities (page 92). However, there is no reference to the CAA, and the RMP/EIS should reflect the fact that there are no provisions in Wyoming's WQS for allowing even temporary exceedance of standards. The BLM would need to prove that existing beneficial uses are fully protected. The methods to be used in the activity plan NEPA documents to predict effects on WQS/beneficial uses should also be described in the RMP/EIS.

- BLM would only reduce "accelerated erosion" in some areas, and "should" increase vegetative cover where "accelerated erosion is not too far advanced" in riparian areas (page 288). This direction appears to contradict the objective on page 92 to "prevent accelerated erosion" (emphasis added). We suggest stronger commitments. Why shouldn't accelerated erosion be prevented rather than reduced? Why shouldn't "accelerated" erosion in riparian areas be adequately controlled/restored even if it is advanced? We suggest that the RMP/EIS contain more specific standards as objectives. The RMP/EIS should also clarify how BLM is addressing the streambank erosion problems identified in the Wyoming 1986 Water Quality Assessment.

- We commend plans to reduce salt loading in the Colorado River Basin watersheds (page 81). What specific salinity reduction projects are needed or planned? How much reduction is planned? We also suggest a map of the specific target areas for salinity control practices.

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Potential adverse effects on ground water, at least for coal mining, are noted on Appendix page 214. However, we found that, 1) the discussion of ground water resources was very qualitative and not specific to the RMP area, and 2) the environmental consequences chapter does not appear to address ground water impacts. Consequently, we have several suggestions.

- The limited site-specific data should be integrated with information from general references to develop a good regional "picture" of ground water resources. We suggest contacting the U.S. Geological Survey (USGS) Office in Cheyenne for any published and unpublished data that exists.

- The discussion of ground water uses (page 149) is extremely qualitative, giving no real indication of how much ground water is actually being used by all use categories. Ground water utilization and source information is necessary to adequately assess the potential impacts on other uses resulting from each alternative.

- The discussion of occurrence and quantity (page 149) centers on saturated thicknesses and ranges of well yields. It is very generic and provides little actual information on the occurrence of ground water in the resource area. There is no discussion of the regional recharge/discharge areas, depth, or even the range of depths at which aquifers are found (by basin). Therefore, the potential to be affected by the actions proposed can not be assessed. Additionally, assessment of potential future utilization of these resources is not possible without specific information on the feasibility and relative ease of accessing the resource. Information for each basin should be provided which describes recharge and discharge areas, overburden depths (i.e., depth to aquifers), a stratigraphic/hydrogeologic section, and information on water quality. This regional information should be available from the USGS office in Cheyenne.

- As described above for other sections of the RMP/EIS, the section on quality (pages 149, 188) is also very general and conveys little information on ground water quality in the resource area, especially for all aquifers below the alluvial aquifer systems. Specific water quality information is necessary to characterize the ground water quality.

- The section on causes of pollution discusses several sources of pollution, all resulting from the energy industry. Information on which aquifers are potentially impacted by the various activities should be included.

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- The RMP/EIS raises the issue of potential ground water pollution and the deterioration of aquifers serving as drinking water sources as a result of injection wells (page 182). The report states that injection wells, used for salt water disposal and enhanced recovery during oil and gas production, pose a "potentially grave threat" to ground water resources of the RMP area. The inclusion of this issue, is somewhat confusing. The Wyoming Department of Environmental Quality (DEQ) and the Wyoming Oil and Gas Division currently implement the Underground Injection Control (UIC) program in the State. Pursuant to this program, UIC Permits are issued only upon an adequate demonstration that underground sources of drinking water will not be endangered as a result of the proposed injection activity. This goal is achieved through the State's regulation of well construction and operation. The excerpt from DEQ's 1986 Water Quality Assessment gives the impression that such regulations do not exist.

  The preferred alternative would designate five million acres as open to oil and gas leasing (with subsequent injection activity). There was however, no discussion of the potential impacts in Chapter 4 to ground water resources resulting from this mineral management decision.

- The UIC program's authority begins when the fluid enters the wellhead. It is the surface management agency's responsibility to regulate the storage and handling of produced water prior to injection. However, good environmental practices, such as proper design of brine pits, appear to be considered just for "important" (and possibly "critical?") watersheds (page 468). Such practices should be applied to all leases with monitoring to insure proper and effective application.

- The alternatives consider making various amounts of land available for coal leasing consideration. Historically, mining has always resulted in increased ground water salinity in the re-saturated spoils. In some coal regions in Colorado and Wyoming, the issue of cumulative effects of salinity loading by mines is resulting in BLM's reconsideration of its ability to continue to lease coal. This issue should be considered in the early planning stages (at the RMP/EIS level of planning) to avoid possible problems later on of costly land exchanges.

  The discussion of "SIGNIFICANT REGULATIONS" for soil, water, and air resources on page 468 should also include the Water Quality Act of 1987 (particularly the Section 319 nonpoint source (NPS) control program), the water resource protection and other water quality requirements of FLPMA, and Executive Order 12088. The discussion of the CWA should include CWA objectives for water quality/ecological integrity, the WQS program, Section 319 (WQS compliance), and correlation of best management practices (BMPs) to meeting WQS.

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Grazing/Range Management

We have several concerns regarding RMP/EIS direction for grazing and range management that should be addressed in revisions of the draft RMP/EIS.

- The objectives of Alternative B: "To manage livestock grazing to enhance wildlife, watershed, and riparian values" (page 46) to reduce "livestock conflicts with other resources" (page 47); and to plan range improvements "with full consideration of soil, water, and air resources" (page 284), appear to be reasonably consistent with FLPMA policy, e.g., Section 102(a)(8), and other statutes (given the question of what "full consideration" and "enhance" mean). Meanwhile, the consistency of the preferred alternative, e.g., "To enhance livestock grazing while maintaining a balance between economic use and management to enhance watershed and riparian areas" (page 46), with FLPMA and other statutes is not clear. We were unable to find adequate support for the statements that the "benefits of implementing" the allotment management plans and projects under the preferred alternative "would be similar to those discussed for Alternative B" (page 281), and that "optimal resource management" would be achieved (page 8). The intent to make eighty percent of any increased forage available to livestock grazing (page 285) undermines the issue of whether the preferred alternative adequately provides for watershed, WQS, riparian, wildlife, and other rangeland ecosystem values. As an example, we question whether "seeding of 11,500 acres of degraded sites" actually would "protect the soil from erosion" (page 281) with such a heavy emphasis on livestock grazing. More assurances with RMP standards are needed. Also, WQS/beneficial uses are not subject to a cost-benefit "balance" process such as suggested by the preferred alternative.

- "Improper turn-out dates and seasons of use" exist on eighty-one percent of the "I" allotments (page 118). The relationship of improper season of use to rangeland decline in the EIS area is described on page 178. Yet the preferred alternative provides spring deferment on only two allotments (Table LVGR-4). Consequently, we question the effectiveness of the preferred alternative in resolving the season of use issue in terms of rangeland ecosystem and watershed protection needs. What are the standards to be achieved by allotment plans for spring grazing management?

- Alternative A would also be quicker in responding to known rangeland problems (page 286) compared to the preferred alternative (page 281). Moreover, the discussion of "earlier benefits where problems are known to exist" on page 282 implies quicker action under the preferred alternative than discussed on page 281.

- Some "ranges have been overstocked and overused" (page 178). Yet the preferred alternative projects substantial increases in animal unit months (AUMs) of grazing. How has the problem of overuse been resolved? In fact, one of the questions to be answered in the RMP is the appropriate livestock stocking levels and adjustments needed "in order to provide adequate forage for livestock, wildlife, and watershed protection" (page 17). This question is consistent with EPA requests for RMP documentation of resource management standards. We were unable to find that the question was fully answered.

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- The RMP/EIS states that "many wildlife species would be virtually unaffected" by the alternatives considered, and other species would not be discussed "because of inadequate inventory data, lack of information necessary to predict effects, or low public interest" (page 183). Numerous species of animals are listed. The RMP/EIS provides insufficient documentation that livestock grazing and mineral development would have virtually no effect on particular species, regardless of whether they are abundant, or there is "abundant habitat", etc.. Furthermore, information on such species may be "relevant to adverse impacts" and "essential to a reasoned choice among alternatives" thus triggering the unwaived requirements of 40 CFR Part 1502.22 for incomplete or unavailable information (since NEPA does not exclude disclosure because of lack of data or "low public interest"). Also, we see a steadily increasing public and inter-agency concern for effects of public land management activities on wildlife species such as those listed on page 183.

  The RMP/EIS also states on page 183 that "mongame" and "warm-water" fish were not considered. However, the CWA protects those fish as well as other parts of "biological integrity", such as trout. The significance of potential effects is insufficiently documented, or correlated to WQS.

- Herbicides "(such as 2,4-D) will be applied . . . in accordance with procedures established in . . . the BLM Manual" (page 418). As requested in our scoping letter, we ask for disclosure of potential effects of herbicide (including for ground water) for the resource area (in more detail than in BLM's Northwest Area Noxious Weed Control Program EIS and Supplement), and "RMP/EIS controls to avoid spraying along creeks and streams and near populated areas". The consistency of the spraying program with grazing control commitments to help prevent infestations/enhance post-treatment success should be described. For mining and chemical control of vegetation, EPA's criteria for toxic materials will need to be followed, except for amounts, benzoine, and chlorine ("Quality Standards for Wyoming Surface Waters", page 14). How will BMPs be selected or modified to insure compliance with toxic criteria?

  Ground water recharge areas are especially susceptible to the rapid transfer of pesticides into the ground water system. Once in this system, their persistence and discharge through springs and seeps forms a threat to other area resources, e.g., wildlife. Clinker or scoria (in coal areas) are typically sites of shallow ground water recharge. The prohibition of pesticide use in recharge areas should be considered in the RMP/EIS.

- As requested in our scoping letter, the RMPs/EIS should clearly compare the priority of expending funds for vegetation manipulation with the need to fund the basic high priority resource protection activities such as streambank and gully stabilization, resource condition inventories, site-specific management plans, riparian area management, and non-manipulation activities to implement Allotment Management Plans (AMPs). What is the cost of these forage treatments versus the benefits?

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Riparian Areas and Wetlands

The BLM objective for all alternatives is to "maintain riparian areas in good or excellent condition and improve areas that are being degraded" (page 61). Does this mean that just those areas already in good to excellent condition will be maintained at that condition? Also, we suggest a thorough description of how "condition" as a measure of riparian values (not just vegetation condition), meets: 1) the BLM Riparian Area Management Policy "to achieve a healthy and productive ecological condition for maximum long-term benefits"; 2) the riparian values noted in the Policy's background statements; and 3) the Executive Order 11990 and 11988 requirements to "preserve, protect, and restore the natural functions of such areas" (page 23).

According to page 46, 1,226 acres of riparian area would be improved in all action alternatives. However, from page 82, 1,481 acres would be improved under Alternatives B and D. Why is the acreage different? Since the Medicine Bow grazing EIS area has 3,011 acres of riparian area (page 238), and only 1,013 acres have been inventoried for ecological condition, it is not clear that all riparian areas will meet the RMP and BLM policy objectives cited in the previous paragraph. This issue is reinforced by preferred alternative intentions to not improve ecological conditions on M and C category allotments "with a downward trend" (page 289), apparently contradicting RMP objectives on page 61. We would like to see the schedule and implementation process for investigating and identifying "Opportunities for improving other riparian habitat for fisheries and wildlife outside "I" allotments" (page 70). Also, we ask that the Wyoming DEQ be informed of the priority areas of treatment so that they can be incorporated into the CWA Section 319 nonpoint source (NPS) assessment report.

The RMP/EIS consistently uses "improve" and "enhance" as the description of effects of planned management on riparian area values. We request that the RMP define what these terms actually mean in the form of riparian standards to be achieved by now and existing activity plans. The action alternatives rely heavily on grazing systems to "improve" or "enhance" riparian areas. However, the preferred alternative shows only two allotments where riparian fencing and spring grazing deferment is planned (pages 397, 399, 403). Apparently, this would exclude grazing from 67 acres (page 61). We question the effectiveness of grazing systems as the only means to achieve adequate improvement and protection of the multiple riparian values. Consequently, more documentation is requested. Also, we support quicker riparian improvements than stated on page 232 since research has shown riparian areas to respond rapidly, once corrective measures are applied.

Alternative B shows the Black Canyon allotment as needing 13.5 miles of riparian fencing and spring deferment (page 377) yet the preferred alternative would have no fencing, grazing system, or spring deferment for the same allotment (page 396). Since fencing under one allotment indicates a need for riparian management, it is not clear that the preferred alternative adequately addresses the problem. Any similar apparent inconsistencies with other allotments should be evaluated and addressed.

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The surface mining lessee in some areas "will be required to develop a habitat recovery and replacement plan" for wildlife habitat (page 315). For wetlands, it is unclear why other values besides habitat are not included in the mitigation plan. BLM's wetland mitigation policy should be described in the RMP/EIS. For example, EPA recommends mitigation on an acre-for-acre, ecological equivalency basis (in some cases, greater than acre-for-acre mitigation may be needed to achieve ecological equivalency). We also request that the RMP/EIS state the acceptable methodologies for determining values lost versus values to be achieved in a mitigation plan. What are the monitoring and management requirements?

We suggest that the RMP/EIS state the locations and planned schedule for initiating landownership consolidations for improved riparian area and fisheries management, and protection of WQS (pages 90, 120).

Areas of Critical Environmental Concern (ACECs)

The comparison of alternatives in Table 1 and elsewhere indicates an ACEC management philosophy to allow various uses and generally to "minimize" damage rather than protect the areas as required by FLPMA. Another example is the "cumulative adverse effects for wildlife" that could occur in the Sand Hills ACEC (page 298). We request a specific description of what will constitute "protection" for each ACEC in order to document compliance with FLPMA. What are the ACEC protection criteria to be met by "mitigation"? Also, we believe that management plans (including inter-agency and public review) are needed for all ACECs; however, it is not clear that such plans are to be done.

Another major concern is that the RMP/EIS alternatives contain different ACEC recommendations. It is our position that the ACECs should be the same (area and size) for all action alternatives. Either they are or are not valid ACECs under FLPMA regardless of what the RMP/EIS alternative is. Management practices may vary by alternative, however, in order to reach the same ACEC protection objectives. Consequently, consistency with FLPMA requirements to "give priority to the designation and protection" of ACECs (Section 202(c)(3)) is not clear. If areas, other than Sand Hills, where watershed, soils, WQS, wetlands, riparian areas, or municipal water supply concerns were considered, what management requirements will substitute for ACEC designation? We would like to see an appendix that describes all potential ACECs recommended by BLM staff or others, reasoning for not recommending any particular area (if any) in the RMP/EIS, and any special management the area(s) may need. The water/aquatic life related ACECs should be submitted to the State for the Section 303 WQS assessment report.

BLM's approach under the preferred alternative to managing the white pelican colonial nesting island "could jeopardize the continued existence of the colony" (page 255). We believe that the island is a good example of what Congress intended for ACEC protection (as proposed in Alternative B) and we recommend RMP/EIS revisions to provide effective protection for the area.

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Monitoring and Evaluation

We do not agree with the decision that water quality monitoring plans would not be addressed in the RMP/EIS (page 18). Our scoping comments requested a comprehensive monitoring program (not plans for each activity) in an RMP/EIS appendix or monitoring chapter. The monitoring program should include such information as: (1) goals and objectives, (2) types of surveys (ambient, intensive) or assessments to be used, (3) parameters to be monitored, (4) management and environmental indicators (aquatic habitat, sediment delivery), (5) monitoring methodologies, (6) mechanisms for monitoring implementation and adequacy of best management practices; (7) the person/position responsible for monitoring, and (8) the feedback loop to achieve timely modifications to activities. Refer to the scoping letter for other components. It would provide the basic framework for Clean Water Act monitoring (including WQS/beneficial uses) in the Resource Area. Groundwater monitoring should also be included. The other agencies and public need to review and comment on this framework in the RMP/EIS. The RMP direction would then be applied to site-specific detail. The RMP monitoring program would help meet 43 CFR Part 1610.4-9 requirements that the "proposed plan" establish "intervals and standards" that "shall provide for evaluation to determine whether mitigation measures are satisfactory". As examples, activities on BLM land would be monitored to assure that "they comply with applicable federal and state standards for air and water quality" (page 221), and rangeland monitoring would include water quality monitoring as needed (page 411). However, there is no assurance that the monitoring framework has been established for determining WQS compliance or to meet CWA objectives. The framework would also apply for evaluating/reporting adequacy of the 85 miles of "trout stream habitat" enhancement under the CWA and FLPMA. What is the early warning system to document existing violations or risk of potential violations of the CWA? An example is the Little Snake River Basin (except Muddy Creek) where intensive monitoring "would be implemented . . . as problems were identified" (page 62). How would the problems be identified?

BLM includes a commendable requirement that lessees for certain coal leasing areas submit "A plan for monitoring surface water and groundwater conditions" (page 315). State WQS would be used "where applicable". However, WQS are applicable on all State waters. What is the CWA monitoring framework (BLM direction) that will be used by lessees to develop adequate monitoring plans? CWA compliance monitoring should be part of the Sheer program operating procedures, when applicable; however, it is not mentioned under monitoring on page 332.

Wilderness Supplement

It appears from the discussion that the Encampment River Canyon and Bennett Mountains Wilderness Study Areas (WSAs) have the appropriate wilderness characteristics and are suitable for wilderness per Section 603 of FLPMA. Consequently, we are asking BLM to clarify why it did not recommend the WSAs as wilderness, and why the reasons are not in the Supplement.

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There are several concerns regarding riparian area management in the Encampment River Canyon ASA. The on-going heavy impacts to the riparian areas discussed on pages 28, 30, 38 and elsewhere appear to invoke FLPMA's requirement "to take any action required to prevent unnecessary or undue degradation of the lands and their resources or to afford environmental protection" to protect wilderness suitability (Section 603(c)). It is unclear why appropriate control measures have not been taken. Further monitoring is planned to determine whether any "habitat degradation is occurring" (page 17) or whether any "adjustments to livestock use" are needed (page 38). However, the discussion indicates ample knowledge of current riparian/streambank conditions as a basis for quick corrective action. About 50 of the 110 acres of riparian area would be excluded from cattle grazing in order to provide camping sites in the non-wilderness alternative. For the non-wilderness alternative, the Supplement should identify the specific objectives for protection of the multiple uses and values of the entire riparian area that would be addressed in a revision of the existing habitat management plan. Under a wilderness recommendation, what are the riparian objectives to be addressed by the wilderness management plan? The Supplement appears to say that no improvement in aquatic life or habitat is expected under wilderness management. However, it is not clear that such improvements could be achieved with a good riparian management program.

6-1

Other Concerns

The water quality-related coordination and consultation with other government agencies should be described (in an implementation chapter or appendix). We suggest periodic Federal/State inter-agency meetings called by BLM as part of a continuing coordination strategy. Under the current memorandum of agreement (MOA) between BLM and Wyoming DEQ, the DEQ prepares a biennial Clean Water Act Section 305(b) water quality assessment that identifies stream segments with significant WQS impairment, and those segments where a "high potential exists for significant impairment due to present and/or anticipated activities affecting runoff from lands managed and under the jurisdiction of BLM." The MOA also calls for an "Annual Meeting and Agreement Review" in order to address goals and priorities, and to "determine programming of coinciding allocations in the respective work plans and budgets of both agencies." We request that an RMP/EIS implementation chapter or appendix recognize the MOA, action taken in response to existing/potential impairments identified in the 305(b) assessment, Medicine Bow-Divide Resource Area contributions to the assessment, planned input to the State 319 NPS assessment and plan, and coordination activities under the MOA. The RMP should identify procedures that will be used to ensure consistency with water quality management plans for the area that have been completed by the State.

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The new Clean Water Act amendments were passed in February 1987. A primary concern is the new NPS control program (Section 319). BLM cannot match other Federal (EPA) dollars, but allotmees, private land owners, and private organizations can and do plan to participate in the program. Some of this work may be done on BLM lands. How will BLM participate in work on mixed-ownership watersheds to improve water quality? BLM is asked to provide an assessment of condition of their water bodies to the State as part of the assessment phase of the 319 program. Additionally, the State will be identifying in it's 319 management program the Federal programs/projects that it plans to review under Executive Order 12372 for consistency with the State's NPS management program (refer to Section 319 of the new Amendments). BLM involvement in this process should be described.

We suggest that an implementation schedule list the specific inventories, assessments, and management plans to be done (in priority order) along with the targeted schedule for completion. Of particular concern to EPA to have included are: WQS/aquatic life assessments; watershed and related management plans; salinity control plans; cooperative management plans; wetland and riparian area inventory and management plans; groundwater studies; and air quality studies. We recommend that the alternative line item budgets and implementation schedule (refer to the draft San Juan RMP/EIS, Utah) be included in an implementation chapter or appendix. What is the linkage of the budgeting process to implementation of RMP-identified projects?

Extensive site-specific project planning and impact analysis/disclosure will be done under this broad RMP/EIS. We believe that there will be a continuing need for public and other agency involvement in planning some of these projects (rather than just having the analyses available in the BLM office). The strategy for this involvement should be addressed in more detail in an implementation chapter or appendix.

POLICY AND PROCEDURES 1640

6P "Review of Federal Actions Impacting the Environment," EPA, Office of Federal Activities, Washington, D.C., October 3, 1984.

SUMMARY OF RATING DEFINITIONS
AND FOLLOW-UP ACTION

Environmental Impact of the Action

LO--Lack of Objections
The EPA review has not identified any potential environmental impacts requiring substantive changes to the proposal. The review may have disclosed opportunities for application of mitigation measures that could be accomplished with no more than minor changes to the proposal.

EC--Environmental Concerns
The EPA review has identified environmental impacts that should be avoided in order to fully protect the environment. Corrective measures may require changes to the preferred alternative or application of mitigation measures that can reduce the environmental impact. EPA would like to work with the lead agency to reduce these impacts.

EO--Environmental Objections
The EPA review has identified significant environmental impacts that must be avoided in order to provide adequate protection for the environment. Corrective measures may require substantial changes to the preferred alternative or consideration of some other project alternative (including the no action alternative or a new alternative). EPA intends to work with the lead agency to reduce these impacts.

EU--Environmentally Unsatisfactory
The EPA review has identified adverse environmental impacts that are of sufficient magnitude that they are unsatisfactory from the standpoint of public health or welfare or environmental quality. EPA intends to work with the lead agency to reduce these impacts. If the potential unsatisfactory impacts are not corrected at the final EIS stage, this proposal will be recommended for referral to the CEQ.

Adequacy of the Impact Statement

Category 1--Adequate
EPA believes the draft EIS adequately sets forth the environmental impact(s) of the preferred alternative and those of the alternatives reasonably available to the project or action. No further analysis or data collection is necessary, but the reviewer may suggest the addition of clarifying language or information.

Category 2--Insufficient Information
The draft EIS does not contain sufficient information for EPA to fully assess environmental impacts that should be avoided in order to fully protect the environment, or the EPA reviewer has identified new reasonably available alternatives that are within the spectrum of alternatives analyzed in the draft EIS, which could reduce the environmental impacts of the action. The identified additional information, data, analyses, or discussion should be included in the final EIS.

Category 3--Inadequate
EPA does not believe that the draft EIS adequately assesses potentially significant environmental impacts of the action, or the EPA reviewer has identified new, reasonably available alternatives that are outside of the spectrum of alternatives analyzed in the draft EIS, which should be analyzed in order to reduce the potentially significant environmental impacts. EPA believes that the identified additional information, data, analyses, or discussions are of such a magnitude that they should have full public review at a draft stage. EPA does not believe that the draft EIS is adequate for the purposes of the NEPA and/or Section 309 review, and thus should be formally revised and made available for public comment in a supplemental or revised draft EIS. On the basis of the potential significant impacts involved, this proposal could be a candidate for referral to the CEQ.

WYOMING CHAPTER
SIERRA CLUB

September 16, 1987

7A

Mr. John Husband, Team Leader
Bureau of Land Management
Rawlins District
P.O. Box 670
Rawlins, WY 82301

Dear Mr. Husband,

The Wyoming Chapter of the Sierra Club has 600 members who frequently use BLM lands for recreation and nature study. We submit the following comments on the draft Resource Management Plan (RMP) and Environmental Impact Statement (EIS) for the Medicine Bow/Divide Resource Areas. These comments fall into two categories, those concerning the adequacy of the documents and those critiquing the proposed Plan.

The Planning Documents

We are pleased by the quality of the documents. The typesetting is crisp, the tables well-organized, and the graphics excellent. The prose is mostly in plain English, although more could be done to improve readability for the general public. A great deal of information is presented, but the judicious use of tables, figures, and maps has prevented overburdening of the documents with excess verbiage. These attributes have greatly helped us in our analysis of the documents. However, there is room for improvement:

Purpose and Need

Chapter 1 needs to be rewritten to make it clear how BLM planning is mandated by the Federal Land Planning and Management Act (FLPMA) and how, since planning is a major Federal action affecting the environment, it falls under the aegis of the National Environmental Policy Act (NEPA). Furthermore, we think it would enhance your credibility if you stated up front your management philosophy.

Alternatives

Table 1 should include biological diversity (both plants and animals) and miles of local, collector, and arterial road construction and (separately) reconstruction. You need to indicate how much timber will be harvested (MMBF) and how much forest land will be subject to different kinds of silviculture (clearcutting, shelterwood, thinning, etc.). Acres of wilderness should also be given.

The maps following Table 1 are well-done but somewhat confusing because some apply to specific alternatives while others apparently apply to all alternatives. This difference

"Not blind opposition to progress, but opposition to blind progress."

Response to Letter 7

7-1. Please note the format in the document.

7-2. The EIS is an analysis of the environmental impacts. The rationale for wilderness recommendation or non-recommendation will appear in the Wilderness Study Report.

7-3. Please see the last paragraph of the Introduction on page 9 of the Draft Resource Management Plan for the Medicine Bow-Divide Resource Area.

7-4. The environmental impact statements for the Ferris Mountain and Adobe Town were covered by the Divide Basin Management Framework Plan. The final Adobe Town-Ferris Mountains Wilderness EIS was printed and made available in January 1988.

7B

needs to be made clear in the captions. We also suggest a set of simple bar graphs comparing the four alternatives in terms of various resource uses, e.g., grazing AUM's, acres open to mineral exploration, wildlife habitat acres, etc. Table 2 (Cumulative Impacts) should be moved to the Environmental Consequences chapter (see below).

Affected Environment

This chapter is very thorough on all resources except grazing. The latter section must be greatly expanded so that its coverage is commensurate with the importance of grazing in the planning area. Needed are bar graphs showing the cumulative acreages in the various ecological condition classes and their trends, and a map showing where areas in each ecological condition class are located.

Maps 5 to 7 and 38 don't seem necessary, while a map of surficial geology would complement the soils map. Figures 8 to 11, while interesting, more appropriately belong in an appendix.

Environmental Consequences

We suggest a reorganization of this chapter to bring out more clearly which types of activities have the greatest potential for environmental effects. As it stands, the chapter is organized with alternatives as major sections and effects on individual resources as subheadings within those sections. It would be better if resources were the sections and alternatives the subheadings.

Effects of grazing are greatly underplayed. Quantitative estimates of soil, water, and vegetation impacts of current and projected grazing levels are needed.

The list of resources should be expanded to include roads and biological diversity. A final cumulative impacts section, including Table 2, would tie together this chapter and indicate which activities in combination exert a larger effect than is apparent when they are considered in isolation.

The Cumulative Impacts table is preferable to a narrative, but it needs improvement. Quantitative predictions of net forest growth and long-term sustained yield would convey more information than "Productivity would increase with time." Quantitative predictions of changes in range condition and trend are also needed. Projections of semi-primitive and primitive recreation demand are desirable. Expected changes in species composition of the various vegetation types should be presented. Hard numbers are needed in place of qualitative statements for wildlife and fisheries.

7-1 Wilderness

We are pleased that you are treating individual Wilderness Study Areas (WSA's) in detail in the Wilderness Supplement. Each area is described comprehensively, a positive feature, but there are some problems. First, the Part/Chapter organization is confusing. Why not a set of chapters like the EIS (Affected Environment, etc.) with WSA's as subheadings? Second, you

7-2 present no justification in the Preferred Alternative for why you

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7-3 prefer Wilderness or no wilderness for each WSA; we are left guessing your motives. Third, there is no integration between the Supplement and the main body of the RMP. Please include Wilderness as a category in Table 1 of the EIS and provide a map of proposed wilderness/no wilderness designations. Finally, why

7-4 are you considering the Pasris Mountains and Adobe Town WSA's separately from the RMP? These are big areas - shouldn't their fate be considered in the RMP?

Proposed Plan

We are very disappointed in the Plan. Important data are not presented or are ignored with respect to grazing and minerals management. The two most important resource problems, overgrazing and impact of oil/gas leasing and development, are ignored and no plan of action is presented to deal with them. Finally, the Plan continues to emphasize grazing, oil and gas, and hardrock minerals at the expense of other multiple uses such as recreation and wilderness, a violation of FLPMA.

Areas of Critical Environmental Concern

We favor designation of all of the Baggs Elk crucial winter range, the Dibben's beardtongue site, the Muddy Gap cushion plant community, White Pelican Island, and the raptor concentration areas as ACEC's. This is particularly important for White Pelican Island, since the white pelican is a candidate for threatened species status. All ACEC's should be totally off-limits to oil/gas leasing, hardrock mineral exploration, and off-road vehicle (ORV) use.

Fire Management

We are pleased to see a limited suppression policy proposed for 36% of the planning area, but in order to make it wash with the public, you need to justify it more fully, e.g., saves money, recognizes role of fire in natural ecosystems, etc.

Forest Management

The proposed Plan calls for a 60% increase in allowable harvest from 12.5 to 20.0 MMBF. We oppose this increase because "there have been no expressions of industry interest in increasing harvest levels" (Casper Star-Tribune, 06-17-87). We are particularly incensed at the idea of "eradicating" stagnant lodgepole pine stands without attempting any wood recovery. With the exception of precommercial thinning and eradication, no information is presented indicating how many acres and what timber volumes would be associated with different silvicultural treatments.

Lands Program

We understand the rationale for disposing of BLM holdings which are isolated and difficult to manage, although no evidence is provide to prove the "difficult to manage" assertion. However, we believe it is wrong to designate lands for disposal to permit "expansion and economic development" of local

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communities. These are public lands whose highest use is improving the national welfare.

Livestock Grazing Management

As indicated in the EIS and the Grazing Appendix, there are serious problems with the quality of rangelands in the planning area. 29.4% of the range is in fair condition and 1.1% in poor condition, while 81 grazing allotments (our of 354 total) have a downward ecological trend (Table LVGR-AP-2). Average five-year grazing use exceeds carrying capacity (current production) on 15 allotments (Table LVGR-AP-1). The EIS (p. 117-118) indicates that 42% of the public land requires range rehabilitation because of inadequate plant production, undesirable species composition, downward range trends, poor animal distribution, and improper seasons of use. Competition between livestock and wildlife for food on crucial winter ranges is acknowledged (EIS, p. 199-202) and is probably widespread, as suggested by Table 24.

What is the Plan's response to these serious problems? Currently, 1.06 million acres out of 6.5 million acres of public land in the planning area are in grazing allotments. This number will not change in the Plan. Grazing will increase 16%, from 181,664 to 188,940 AUM's, purportedly due to increased plant productivity. This is hard to believe, since only 29 allotments have upward trends in range condition, while 81 have downward trends and the rest are static. Cattle will be excluded from a paltry 67 acres of riparian zone and 1,130 acres of crucial wildlife winter range.

Table LVGR-AP-4 shows that actions intended to improve range conditions are limited to non-continuous grazing systems on 53 allotments, later turnout dates on two allotments, 5.5 miles of fencing to protect riparian zones, and 37 reservoirs fenced off. A much greater commitment is made to actions to benefit cattle and sheep: 101 miles of new fences, 113 new reservoirs, wells, and springs, 8 miles of pipeline, 1,250 miles of snow fences, burning, disking, and spraying of 58,308 acres, and seeding (presumably to crested wheatgrass, an exotic species) of 11,500 acres.

The Plan should devote considerably more resources to restoring degraded rangelands. Protective actions must be undertaken, including reducing livestock numbers (heresy!) and instituting non-continuous grazing systems on most allotments. Failure to undertake these actions will only make the rangeland restoration job more gargantuan in the future.

Minerals Management

We had to deduce how much of the planning area would be open to oil/gas leasing, since that figure was nowhere stated. BLM has authority to issue leases on the 12.5 million acres it manages, plus 1 million acres of Forest Service land and 900,000 acres (15% of 6 million acres) of split-estate lands. Five million acres (85% of the available acres) are currently available and will be available for leasing under the proposed Plan (Table 1, p. 51). 85% of these lands are already leased.

Of a total of 122,720 acres of coal lands (summing all items

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in Table 1, p. 49-51), 121,685 acres (92%) would be open to leasing under the Plan, an increase of 30% over existing available acres. This increase is proposed even though, historically, coal mining has not approached permissible levels in the planning area (Casper Star-Tribune, 06-17-87). All lands over which BLM has leasing authority would be open to all shale and geothermal leasing.

The environmental consequences of minerals management have not been explicitly addressed in the EIS. A brief reference is made to coal EIS's (p. 118), but apparently there has been no environmental analysis carried out for oil and gas leasing. This is a serious oversight, because once a lease has been issued, the BLM cannot prevent lease development. The EIS should summarize the environmental impacts of current oil/gas, coal, and oil shale leasing within the planning area and should predict the potential impacts of full field oil/gas development and of mining of all the coal which will be made available for leasing. This information should be summarized in the Cumulative Impacts table.

We feel that lands should be opened to hardrock prospecting, coal mining, and oil/gas leasing only after thorough environmental analysis, including cumulative effects, has indicated which lands can be developed without major, irreversible resource damage.

Recreation Management

No provision is made to ensure that capacity for semi-primitive and primitive recreation will be sufficient to meet demands. We recommend adoption of land use classifications which will provide a range of recreational use, e.g., areas where motor vehicles are permitted only on existing roads and trails, areas where motor vehicles are restricted to roads, and areas where no motor vehicles (including snowmobiles) are allowed.

While the proposed policy of confining ORV's to existing roads and trails is laudable, it is unenforced and unenforceable with current BLM resources. Off-road and off-trail ORV use is widespread and damage to soils, water, and vegetation is increasing, particularly with the boom in 4-wheel ATV's and young drivers. Even if ORV's could be confined to existing trails, many trails are not maintained to sustain motorized use without eroding. The EIS presents no information on areas where ORV damage is occurring, a serious deficiency. An extensive inventory of the planning area for ORV problem areas is needed. These areas should then be closed to ORV's and rehabilitation plans developed for each area.

Soils, Water, and Air Management

The EIS is in clear violation of Executive Order 11990 and the BLM regulations which implement that order. The regulations state that it is BLM policy to inventory riparian habitats, "preserve and enhance" these habitats, and carry out actions outside of these habitats if "environmentally acceptable" alternatives exist. All the Plan says is that it will "maintain riparian areas in good and excellent condition and improve areas that are being degraded" (Table 1, p. 61). This statement fails

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far short of the specificity required by the Executive Order. The EIS should contain a map showing riparian zones, a table listing areas where resource damage is occurring, and a plan for restoration of each area.

Wilderness

Roadless areas comprise only 2.9% (114,000 acres) of BLM holdings in the planning area (including Ferris Mountains and Adobe Town WSA's). Since this is such a small percent and since no wilderness currently exists on BLM land in southeast Wyoming, we believe that all the WSA's should be recommended for wilderness designation. Wilderness status would not interfere with grazing in Encampment River Canyon WSA and is unlikely to affect oil and gas production in Bennett Mountains WSA, since oil/gas potential there is low (EIS, p. 78).

FLPMA and NEPA Violations

The proposed Plan intends to maintain minerals (oil/gas, coal, and hardrock) as the dominant uses in the planning area, with grazing as the second most important use. This is a clear contravention of the multiple use mandate of FLPMA. Non-consumptive uses such as wildlife, recreation, and wilderness are given short shrift by this Plan, just as they have been in the past.

There is little variation among alternatives in terms of available acreages for many resource uses. For example, acres available for grazing vary less than 2% among alternatives and no alternative offers less than 145,000 AUM's (Table 1, p. 46). For minerals, the lowest percentages of available acreage are: coal - 64% of coal-bearing areas, oil/gas - 59% of all public lands, and locatable minerals - 85% of all public lands. These figures indicate that the EIS violates NEPA, which requires Federal agencies to "Rigorously explore and objectively evaluate all reasonable alternatives..." (40 CFR 1502.14). Furthermore, EIS's must provide "a clear basis for choice among options by the decisionmaker and the public" (40 CFR 1502.14).

As it stands now, with respect to grazing and minerals, the alternatives are not really alternatives at all. To meet the requirements of NEPA, alternatives which call for modest reductions in grazing and lands open to mineral exploration should be presented.

Thank you for your consideration of our comments.

Sincerely yours,

Jeffrey S. Foster
BLM Committee Chair

8A

Working for the Nature of Tomorrow

NATIONAL WILDLIFE FEDERATION

Thomas J. Dougherty, Central Rocky Mountain Regional Executive
Box 401, Fleming Law Building — C.U.
Boulder, Colorado 80309 (303) 492-6552

October 21, 1988

BLM CTR FT WILDERNESS
RECEIVED
89 OCT 26 AM 8:11
RAWLINS, WY

John Husband, RMP Team Leader
Bureau of Land Management
P.O. Box 670
Rawlins, WY 82301

Re: Encampment River Wilderness Study Area

Dear John:

A belated thank you to you, Bud Holbrook, and your staff for taking the time out of your busy schedules for a site visit to the Encampment River W.S.A. I have visited the area several times this summer and, as I had told you earlier, spent a lot of time on the Encampment River during my high school and college years.

I feel the BLM has an opportunity to assure long term protection for a truly unique area of the West by reconsidering its recommended preferred alternative on the Encampment River W.S.A. I have attached National Wildlife Federation's evaluation of the Encampment River W.S.A. based on the BLM's Planning Criteria and Quality Standard (DEIEM Supp at 7-8).

Please feel free to contact me if I might be of any assistance during your final evaluation on this extremely important matter.

Sincerely,

Tom Dougherty
Regional Executive

Enclosure

Response to Letter 8

Thank you for your comments.

8B

The Encampment River Canyon Wilderness Study Area should be recommended for Wilderness designation.

a). The Encampment River Canyon Wilderness Study Area has numerous important values which render it an outstanding candidate for Wilderness protection. The BLM's decision to exclude the Encampment River Canyon WSA from Wilderness recommendation is difficult to understand in light of the many unique and outstanding features of this rugged, highly scenic canyon. The canyon provides a unique ecological zone sharply contrasting with the forested areas to the south and the desert to the north. (DEIS, W.Supp., at 27). It contains some forested areas and high rocky ridges that overlook the rare riparian zones in the canyon below. (DEIS, W.Supp., at 27). Most of its natural features have been undisturbed by human intrusions, and, in the BLM's own estimation, the area contains outstanding opportunities for solitude. (DEIS, W. Supp., at 27).

The area also contains crucially important wildlife habitat for bighorn sheep, mule deer and elk (DEIS W. Supp. at 28-29), and its aspen stands and riparian zones are used by up to 165 species of wildlife (DEIS W. Supp. at 29). The Encampment River Canyon also provides outstanding opportunities for primitive recreation, including fishing, hunting, backpacking, wildlife viewing and spring kayaking. (DEIS W. Supp. at 27).

Because of its unique values, a portion of the canyon is already under consideration for designation as a National Natural Landmark (DEIS W. Supp. at 27), and the canyon may become home to a trail connecting to the Continental Divide National Scenic Trail, established by Congress in 1978 and extending from Mexico to Canada. (DEIS W. Supp. at 27; RMP/DEIS at 139, 150).

Protecting this area is especially warranted because of its extremely close proximity to the Forest Service's Encampment River Wilderness1/ and, further upstream, the river is under consideration for designation as a wild and scenic river. (DEIS W. Supp at 25, 27).

1/ One state school section separates the BLM, WSA and the USFS Encampment River Wilderness Area. This state section would be an excellent candidate for a land exchange at some future time, this would then make the two wilderness areas contiguous.

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b). Designation of the canyon as Wilderness would provide important protection for the rare values of the canyon which are not adequately protected throughout the rest of the resource area. The opportunities for seeking out the solitude of Wilderness in the Medicine Bow/Divide Resource Area apparently will be quite limited under the proposed RMP. Out of 4 million acres in the Resource Area, BLM is recommending only 1,145 acres for consideration as Wilderness. (RMP/DEIS at 1; DEIS W. Supp. at 4). This extremely stingy allocation of land for recreational solitude -- amounting to less than 0.02 percent of the entire RA -- alone warrants reconsideration of the BLM's recommendation not to protect Encampment River Canyon.

It is clear, too, that the forested areas of the canyon will be increasingly a rare commodity in the future in light of the plans outlined in the RMP. To begin with, forested areas are rare in the resource area, amounting to only 111,000 acres, and the RMP/EIS envisions a heavy allocation of these lands for timber cutting. (DEIS at 106, 107, 40).

The riparian habitat of the canyon is also a rare commodity in this resource area, especially important to wildlife; and the canyon's riparian zones have already been damaged by overgrazing. (RMP/DEIS at 149; DEIS W. Supp. at 29). Wilderness designation would further reduce potential threats to this rare and important habitat.

The entire proposed WSA consists of crucial winter range for a herd of bighorn sheep, which has already suffered drastic population declines apparently due to disease, intrusions from off-road vehicles and livestock grazing conflicts. (DEIS W. Supp. at 28). Wilderness designation would remove the off-road vehicles and prevent other intrusions that might accelerate the decline of the bighorn sheep in the area.2/

The canyon also contains critical winter range for the Baggs elk herd, which under plans envisioned by the RMP, will be under

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2/ The current condition of the Encampment River big horn sheep herd does warrant special provisional exceptions enacted by Congress that would allow the BLM and Wyoming Game & Fish to implement some big horn sheep management alternatives such as controlled burns. While these management alternatives are not normally allowed in wilderness areas in the U.S., Congress has made exceptions (e.g. Whiskey Mountain USFS Wilderness Area, 1981) in those areas where sensitive wildlife species management was absolutely in the best interest of that species.

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severe pressure from other developments in the area -- from oil and gas development (RMP/FEIS at 117); from coal development near Savery and on the Atlantic Rim (RMP/FEIS at 114, 118); from potential uranium mining at Ketchum Buttes and Poison Basin (RMP/FEIS at 120-21). In light of these threats, protection of a portion of the winter range of this herd of elk would be extremely beneficial.

Similarly, the mule deer with critical range in the Encampment River Canyon will also be under severe pressure from oil and gas development (RMP/FEIS at 117); coal development on the Atlantic Rim (RMP/FEIS at 116); and potential uranium mining in the Poison Basin (FEIS at 120-21). Again, Wilderness protection might serve to offset intrusions in other portions of the mule deer's habitat.

c). Wilderness designation for the Encampment River Canyon would have only minor impacts on potentially competing resource values. Wilderness designation of the canyon would have small impacts on potential mineral development. There are no oil and gas leases in the area, and the area is rated as having "low" potential for oil and gas production. (DEIS W. Supp. at 32). Throughout the rest of the Medicine Bow Resource Area, BLM has allocated nearly 5 million acres--virtually every inch of federal land--as open for oil and gas leasing. (RMP/FEIS at 51). The loss of this small and "low" potential WSA would have virtually no impact on oil and gas development in the region.

Additionally, the BLM has issued no permits for removal of salable minerals in the canyon area, and there are no commercial deposits known in the area. (DEIS W. Supp. at 25).

The area does have some potential for the occurrence of locatable minerals, but there has never been any known shipments of ore from the area and further developments is not expected. (DEIS W. Supp. at 32). Throughout the region, the Medicine Bow RMP plans to open up more than 800,000 acres of areas to new potential mineral location. (RMP/FEIS at 45). The loss of this small and especially unique WSA would have no impact on potential new mining in the region. The canyon does contain 17 existing mining claims, but the designation of this area as Wilderness would not preclude their development--although that is seen as unlikely. (DEIS W. Supp. at 21).

Designation of the area as Wilderness would lead to the exclusion of off-road vehicles from five miles of road now used in the area, but the area is already closed for half the year to ORV use, and even BLM concedes the complete closure of the area would have virtually no effect on opportunities for motorized recreation in the region. (DEIS W. Supp. at 39).

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Designation of the area as Wilderness would also not preclude livestock grazing within the area--although, to protect the crucial wildlife habitat in the WSA, we believe the BLM should end or severely reduce grazing within the WSA. (DEIS W. Supp. at 21).

There are no water projects expected to be developed in the WSA; consequently, wilderness designation would cause no impacts on that potential. (DEIS W. Supp. at 11).

d) Wilderness designation would be extremely beneficial for the unique ecological values of the Encampment River Canyon. Designation of the Encampment River Canyon as Wilderness would provide crucially important protection for the solitude, scenery and wildlife of the canyon. The closure of this small area to potential mineral development would be quite beneficial even though such development is unlikely--because if such development were to occur, it would be catastrophic for the ecology of the area. Because the mineral potential in this area is generally low, this protection would come at very low cost to the mineral industry in the region. Because the opportunities for recreational solitude in the region are so limited, this protection would be doubly beneficial.

The closure of the area to ORV use would relieve some of the pressure on the bighorn herd in the area--already under pressure and declining in population. Similarly, protection from mineral development will ensure the big game herds of the WSA some needed protection in light of the huge increases in development expected elsewhere in the region.

e). Wilderness designation would not preclude temporary river improvements aimed at bolstering the already fine trout fishing in the river and the construction of an enclosure fence to keep livestock out of camping areas. Because of restrictions on the use of motorized equipment in Wilderness areas, BLM previously insisted that work aimed at improving trout pools in the Encampment River and to construct camping "enclosures" could not be undertaken. (DEIS W. Supp. at 39). Even if this were true, it would be a ridiculously small objection to protecting the canyon as Wilderness. The river, even without improvement, already is rated as "very good trout waters with statewide importance." (DEIS W. Supp. at 27). And the construction of human "corrals" to facilitate camping is not likely to benefit recreationists at all that much given BLM's refusal to exclude grazing from the area. Nevertheless, Wilderness designation will not preclude this work from being done. Until the land is designated as Wilderness, FLPMA does not prohibit the "non-impairing" use of motorized equipment in Wilderness Study

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Areas. This minor, "non-impairing" work could be done prior to Wilderness designation. Moreover, Congress can make specific exemptions in acts designating Wilderness areas for specific projects it envisions as necessary--and BLM could easily request such a waiver for these minor matters.

d: 9175X

JOHN F. FREEMAN

9A

1703 SOUTH 17TH STREET
LARAMIE, WYOMING 82070
307-742-5483

30 July 1987

Mr. John Husband
BLM, P.O. Box 870
Rawlins, WY 82301

Dear Mr. Husband:

I have read (sic) the "Draft Resource Management Plan/ Environmental Impact Statement for the Medicine Bow Resource Area." I wish to make a comment regarding the Encampment River Canyon area.

If I understand your study and conclusions correctly, then one of your underlying assumptions has been to prepare a proposal which attempts to satisfy all current and potential users, at least to some extent. For example, you attempt to satisfy backpackers by proposing to enclose camp sites along the river; to satisfy local fishermen by proposing to augment the number of game fish within the Encampment River and Miner Creek; and to satisfy the livestock people by proposing to continue grazing. Finally, you propose to protect the sheep by curtailing vehicular traffic certain months of the year. In other words, you have prepared an acceptable political document.

While I do not argue with your general conclusion (no wilderness recommendation, but on the grounds that it won't pass Congress until a change of administration), I do question your proposal to construct "wooden fence exclosures"; to place "pool structures" along Miner Creek; and to place boulders in the Encampment River. None of these proposals commander the heading of "no action." Backpackers with sense can camp as well a few feet from the River (where the terrain discourages cattle movement); "pool structures" along Miner Creek will involve considerable disturbance of that area, under long as cattle are permitted in this area, you will always have problems along the stream. Placing of boulders in the River will also create disturbance. I am especially concerned about the possibility of using heavy machinery along Miner Creek. Having fished that area for some 20 years, I have noticed no degradation of fishing. Indeed, it seems as if the opposite has occurred. Lower Miner Creek is also a nesting area for various large birds, including the blue heron, and my sense is that if there are enough fish for the heron, there are enough fish for the rest of us.

Response to Letter 9

1-1. Please note in the final EIS that fisheries management actions and the corrals have been deleted.

9B

To be sure, the "improvements" which you propose will satisfy a number of constituencies, and they will provide a little extra work for the BLM and/or subcontractors. I would like to suggest, however, that by the standards of common sense, the value of the Encampment River Canyon area will be enhanced by being left alone. It would seem to me that the question is not what is best for the users but what is best for the land (as in BLM).

Sincerely yours,

John F. Freeman

John F. Freeman

10A

UNITED STATES
DEPARTMENT OF THE INTERIOR
FISH AND WILDLIFE SERVICE
Fish and Wildlife Enhancement
Wyoming State Office
3120 Capitol Avenue, Room 2010
Cheyenne, Wyoming 82001

November 2, 1987

IN REPLY REFER TO:

WLCO Divide/Medicine Bow RMP

MEMORANDUM

To: State Director, Wyoming State Office, BLM, Cheyenne, WY

From: State Supervisor, Wyoming State Office, USFWS, Cheyenne, WY (FWE-61411)

Subject: Medicine Bow/Divide Resource Management Plan Biological Assessment

We have reviewed the Medicine Bow/Divide Resource Management Plan Draft Environmental Impact Statement (RMP/DEIS) and Biological Assessment, per your request. Based upon the information presented in the Assessment and Bureau of Land Management's (BLM) commitment to consult with us on specific management actions, we concur with your determination of no effect to listed species. However, we would like to comment on the following issues.

We note that the RMP/DEIS discusses analyzing powerline rights-of-way applications on a case-by-case basis. Improperly designed powerlines pose electrocution and collision hazards to bald eagles, peregrine falcons, and other large raptors. Bald eagles and peregrine falcons are susceptible to collisions with powerlines when actively pursuing prey and/or in adverse weather conditions. To avoid potential electrocutions to these birds, all powerlines should be raptor-proofed according to the specifications provided in Raptor Research Report No. 4, "Suggested Practices for Raptor Protection on Power Lines - The State of the Art in 1981". If you do not have a copy of this publication, it can be purchased ($5.00/copy) by writing to:

Jim Fitzpatrick, Treasurer
Raptor Research Foundation
Carpenter St. Croix Nature Center
12805 St. Croix Trail
Hastings, Minnesota 55033

Response to Letter 10

See Chapter 1, page 8, number 15 --Threatened and Endangered Species.

The Assessment briefly discusses those species that could be affected by depletions from the Green and North Platte River Systems. We agree that consultation can take place on potential depletion projects when such projects are identified. The Assessment states that no depletion causing projects are expected or planned during the life of the RMP/DEIS. We are aware of two such projects that may require rights-of-way permits from the BLM: Seminoe Reservoir Enlargement on the North Platte; and Sandstone Reservoir near Baggs, in the Green River System.

A population of Wyoming toads was discovered this year, and an interagency working group has been assembled to work on Wyoming toad recovery. We noted that several areas of land in Albany County have been identified for potential disposal. Any land exchanges or disposal actions in Albany County need to be reviewed to assure that occupied or potential Wyoming toad habitat will not be adversely affected.

The RMP/DEIS also discusses rare plants. Please note that both Gibben's beardtongue (Penstemon gibbensii) and persistent sepal yellowcress (Rorippa calycina) are both Category 2 candidate species; neither has been proposed for listing. The RMP/DEIS identified potential land disposals near Cheyenne that may occur in occupied habitat for another candidate plant. Land exchanges near Cheyenne need to be reviewed for potential impacts to the Colorado butterfly plant (Gaura neomexicana coloradensis).

Your efforts to meet our joint responsibilities under the Endangered Species Act are appreciated. Please contact us if we can be of further assistance.

R. G. Stanley

cc: FWS, FWE-61130, Helena FO, Helena, MT
Director, WGFD, Cheyenne, WY
District Manager, BLM, Rawlins, WY

CMF/clh

FWE-61411:R65/cmr (EMail:DIV-MED.REM:11/2/87)

"Take Pride in America"

GLOSSARY

ALLOTMENT. An area allocated for the use of the livestock of one or more qualified grazing lessees. It generally consists of BLM-managed lands but may include parcels of private or state-owned lands. The number and kind of livestock and period of use are stipulated for each allotment. An allotment may consist of several pastures or may be only one pasture.

ANIMAL UNIT. A standardized unit of measurement for range livestock or wildlife. Generally, one mature (1,000-pound) cow or its equivalent, based on an average daily forage consumption of 26 pounds of dry matter per day.

ANIMAL UNIT MONTH. A standardized unit of measurement of the amount of forage necessary for the sustenance of one animal unit for one month; also, a unit of measurement that represents the privilege of grazing one animal unit for one month.

BOARD FOOT. A unit of solid wood 1 foot square and 1 inch thick.

BROWSE. The tender shoots, twigs, and leaves of trees and shrubs often used as food by deer, antelope, livestock, and other animals; to feed on browse.

CLOSED (OHV). Vehicle travel is prohibited yearlong with no exceptions other than for emergency vehicles in emergency situations. Access by means other than motorized vehicles is permitted.

COMMERCIAL FORESTLAND. Forestland that is now producing or is capable of producing at least 20 cubic feet of wood fiber per acre per year from commercial coniferous tree species, and which has met certain economic, environmental, or multiple use criteria for inclusion in the commercial forestland base.

COVER. Vegetation or terrain used by wildlife for protection from predators and adverse weather conditions. Cover is a major component of wildlife habitat.

CRUCIAL HABITAT. Habitat on which a species depends for survival because there are no alternative ranges or habitats available.

CRUCIAL WINTER RANGE. The portion of the winter range to which a wildlife species is confined during periods of heaviest snow cover.

CULTURAL RESOURCE. A fragile and nonrenewable remnant of human activity, occupation, or endeavor reflected in districts, sites, structures, building, objects, artifacts, ruins, works of art, architecture, and natural features.

ENDANGERED SPECIES. Any plant or animal species that is in danger of extinction throughout all or a significant portion of its range, as defined by the U.S. Fish and Wildlife Service under the authority of the Endangered Species act of 1973.

ENVIRONMENTAL IMPACT STATEMENT. A written analysis of the impacts of a proposed project and alternatives.

FISHERMAN DAY. One fisherman fishing all or part of one day.

FORAGE. All browse and herbaceous foods available to grazing animals.

FORESTLAND. Land that is now, or is capable of becoming, at least 10% stocked with forest trees, which has not been developed for nontimber use.

HABITAT MANAGEMENT PLAN. An officially approved activity play for a specific geographic area of public land. An HMP identifies wildlife habitat and related objectives, defines the sequence of actions to be implemented to achieve the objectives, and outlines procedures for evaluating accomplishments.

INHOLDINGS. Private or State owned land inside the boundary of a WSA, but excluded from the WSA.

JEEP TRAIL. A two-wheel track created only by the passage of vehicles. A trail is not a road.

LIMITED (ORV). Vehicle travel is restricted in some manner in the area. Restrictions could take many forms, but the most common are "limited to existing roads and trails," which allows vehicle travel only on roads that were in existence at the time of designation or as authorized for future uses; "limited to designated roads and trails," which allows vehicle travel only on roads that the BLM designates by signs; and "seasonal restrictions," which restricts vehicle travel in an area or on certain roads during some portion of the year (such as wintertime vehicle restrictions to protect big game on crucial winter range).

Under limitations to existing or designated roads and trails, vehicle travel off roads is permitted only to accomplish necessary tasks and only if such travel would not result in resource damage. Necessary tasks are defined as work requiring the use of a motor vehicle. Examples include picking up big game kills, repairing range improvements, managing livestock, and mineral activities where surface disturbance does not total more than 5 acres, as described in the provisions of 43 CFR 3809.1-3.

NATURALNESS. Refers to an area which "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable." (From section 2 (C), Wilderness Act)

NONIMPAIRMENT CRITERIA. A series of guidelines which govern surface disturbing activities on lands being studied by BLM for inclusion in the National Wilderness Preservation System. The guidelines require that lands be managed so as to not impair their suitability for designation as wilderness. Any authorized activities must be temporary in nature and not degrade the area's wilderness values. Disturbed areas must be capable of being reclaimed so that they are substantially unnoticeable by the time the Secretary of the Interior makes his recommendation on Wilderness Areas to the President.

OFF-ROAD VEHICLE. Any motorized tracked or wheeled vehicle designed for cross-country travel over any type of natural terrain. Exclusions (from Executive Order 11644, as amended by Executive Order 11989) are nonamphibious registered motorboats, any military, fire, emergency, or law enforcement vehicle while being used for emergency purposes, any vehicle whose use is expressly authorized by the authorizing officer or otherwise officially approved, vehicles in official use, and any combat support vehicle in times of national defense emergencies.

OUTSTANDING. Standing out among others of its kind; conspicuous; prominent; or, superior to others of its kind; distinguished; excellent.

PRIMITIVE UNCONFINED RECREATION. Nonmotorized and nondeveloped types of outdoor recreational activities.

PUBLIC LAND. As used in this document, surface or mineral estate administered by the Bureau of Land Management.

RANGE IMPROVEMENT. Any activity or program on or relating to rangelands that is designed to improve production of forage, change vegetation composition, control patterns of use, provide water, stabilize soil and water conditions, or provide habitat for livestock, wild and free-roaming horses and burros, or wildlife. Range improvement projects may be fences, reservoirs, brush control, or spring and well developments.

GLOSSARY

RANGELAND MONITORING PROGRAM. A program designed to measure changes in plant composition, ground cover, animal populations, and climatic conditions on the public rangeland. Studies monitor changes in range condition and determine the reason for any changes. Studies also monitor actual use, forage utilization, trend, and climatic conditions.

RIPARIAN. Situated on or pertaining to the bank of a river, stream, or other body of water. Normally used to refer to plants of all types that grow rooted in the water table of streams, ponds, and springs.

ROAD. For the purpose of BLM's wilderness inventory, the following definition has been adopted from the legislative history of FLPMA:

"The word 'roadless' refers to the absence of roads which have been improved and maintained by mechanical means to ensure relatively regular and continuous use. A trail maintained solely by the passage of vehicles does not constitute a road."

To clarify this definition, the following subdefinitions also apply.

Improved and Maintained - Physical human actions taken to keep a road open to vehicular traffic. A trail maintained solely by the passage of vehicles does not constitute a road.

Mechanical Means - Use of hand or power machinery or tools.

Relatively Regular and Continuous Use - Vehicular use which has occurred and will continue to occur on a relatively regular basis. Examples are access roads for equipment to maintain a stock water tank or other established water sources, access roads to maintained recreation sites or facilities, or access roads to mining claims.

SOLITUDE. The state of being along or remote from habitations; isolation. A lonely, unfrequented, or secluded place. Factors contributing to opportunities for solitude are vegetative screening, topographic relief, vistas, and physiographic variety.

SPLIT ESTATE. Surface and minerals of a given area in different ownerships. Frequently the surface will be privately owned and the minerals federally owned.

THREATENED SPECIES. Any plant or animal species that is likely to become an endangered species throughout all or a significant portion of its range, as defined by the U.S. Fish and Wildlife Service under the authority of the Endangered Species Act of 1973.

TWO-TRACK TRAIL. See "Jeep Trail."

VISITOR DAY. A measure of recreation use; one visitor in an area for 12 hours, 2 visitors for 6 hours, etc.

WILDERNESS. The definition contained in Section 2(c) of the Wilderness Act of 1964 is as follows: "A wilderness, in contrast with those areas where man and his own works dominate the landscape, is hereby recognized as an area where the earth and its community of life are untrammeled by man, where man himself is a visitor who does not remain." Wilderness is an area of undeveloped Federal land retaining its primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions and which (1) generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable; (2) has outstanding opportunities for solitude or a primitive and unconfined type of recreation; (3) has at least 5,000 acres of land or is of sufficient size as to make practicable its preservation and use in an unimpaired condition; and (4) may also contain ecological, geological, or other features of scientific, educational, scenic, or historical value.

WILDERNESS AREA. An area formally designated by Congress as part of the National Wilderness Preservation System.

WILDERNESS STUDY AREA (WSA). A parcel of public land that through BLM's wilderness inventory process has been found to possess the basic wilderness characteristics of being at least 5,000 acres in size, being primarily natural, and having outstanding opportunities for solitude or primitive and unconfined types of recreation.

WORK YEAR. One person working a normal schedule of 40 hours per week for one year.

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STORET

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